

Premerger Notification Requirements Under the Hart - Scott - Rodino Antitrust Improvement Act of

## Dear Mr. Verne:

April 7, 1999

Mr. Michael Verne

Bureau of Competition Room #303

Washington, DC 20580

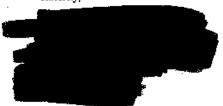
Federal Trade Commission 6th Street & Pennsylvania Ave., N.W.

Lam writing to confirm our telephone conversations on April 6, 1999. During our conversations I briefly described a proposed transaction as follows:

> Seller is selling a parcel of real estate to purchaser for a price in excess of \$30 million. Purchaser owns other assets that exceed \$100 million in value. The real estate is improved as a mobile home park and is located in Illinois. The mobile homes are owned by individual residents who each lease a space for the mobile home from the park operator.

You advised me that the transaction was exempt from the Premerger Notification Requirements under the Hart-Scott-Rodino Antitrest Improvement Act of 1976 because the real estate is considered residential property and therefore exempt under Section 802.2(d) of the Code of Federal Regulations. Should your opinion be different than I have above stated, please notify me immediately. Unless I hear from you to the contrary, I will assume the proposed transaction is exempt from the premerger notification requirements and the parties will not file the Notification And Report Form (FTC Form C4).

Sincerely,



AGREE - Buchelle