



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

Office of the Director  
Bureau of Competition

FEB 17 2009

D. Bruce Hoffman, Esq.  
Hunton & Williams  
1900 K Street NW  
Washington, DC 20006

RE: Carlisle Companies Inc./ACH Foam Technologies  
FTC File No. 071-0158

Dear Mr. Hoffman:

The Federal Trade Commission's Bureau of Competition conducted a nonpublic  
investigation to determine whether the