Office of the Director
Bureau of Competition

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

March 18,2011

Christopher J. MacAvoy, Esq.
Baker Botts LLP
The Warner
1299 Pennsylvania Ave., NW
Washington, D.C. 20004-2400

Re: SuperValu, Inc.lC&S Wholesale Grocers, Inc.,
File No. 091-0119

Dear Mr. MacA voy:

The Federal Trade Commission's Bureau of Competition has been conducting a
nonpublic investigation to determine whether SuperValu, Inc., C&S Wholesale Grocers, Inc., or any other unnamed persons, partnerships, or corporations have engaged or are engaging in any unfair methods of competition in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended, by agreeing to divide markets, allocate customers, or otherwise eliminate