

Mr. B. Michael Verne Premerger Notification Office Room 303 Federal Trade Commission 6th Street & Pennsylvania Ave. NW Washington, DC 20580

> Re: Request for Clarification of Informal Ruling In Response To My June 16 Fax

Dear Mr. Verne:

Refere colling Name: Combate among the the filting on the closed in may June 16 fax, I would appreciate your clarifying whether we should file on behalf

My impression, which may have been nastaken, in our conversation on June 20 was that the acquiring person would be Group, Iac., after it had become a \$100 million player through acquisition of A, and the acquired person would be B. Because the FTC treats this sort of transaction as a consolidation, however, I wonder whether § 801.2(d)(2)(iii) applies. That section states:

will lose their separate pre-acquisition identities shall be both acquiring and acquired persons.

In realty, A, B, and C did not "lose their separate pre-acquisition identifies," but they did become wholly-owned subsidiaries of Group, Inc.

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