

(DK)

October 27, 1983

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Premerger Notification  
Bureau of Competition, Room 303

Corporation A  
(\$100,000,000 in assets)

Owms 50%

SECOND TRANSACTION

(\$100,000,000 in assets) \$10,000,000 in assets (\$50,000,000 in assets)

own ultimate parent entity. Following that interpretation, C is not acquiring

We further discussed the definition of "control" in the FTC Rules section

section to mean that since neither A nor B own more than 50 percent of the voting securities" in an unincorporated joint venture, and that in an unincorporated joint venture there are no individuals who exercise functions similar to the

in the FTC Rules section 801.1(a)(3) since J.V. is not controlled by any other

this letter incorrectly states the FTC's position regarding this subject.