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March 16, 1988

This material may be confidential under Section 7A (b) of the Freedom of Information Act which restricts release of information.

Mr. Patrick Sharp
Premerger Notification Office
Federal Trade Commission
Washington, D.C. 20580

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Subject: Hart-Scott-Rodino Antitrust Improvement Act of 1976

Dear Mr. Sharp:

This will confirm our telephone conversation today concerning the exemption from reporting under the

course of business.

I described for you a proposed asset acquisition in which the buyer, a forest products company, would purchase a tract of timberland. Although timber has been harvested from the tract of timberland in the past, harvesting operations have not been conducted for several years. The assets to be

facilities.

You indicated that it is the current position of the

would be exempt because it involved only a sale of "raw land" (i.e., land and growing timber without any mills, conversion facilities, manufacturing plants or the like) and because the timberland is being purchased as a basic raw material for the buyer's regular business, the manufacture and sale of forest products.

Thank you for your assistance in this matter.

Very truly yours,



I concur
Patrick
3-21-88