

Rule 802.1(b)

[REDACTED]

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Material may be withheld
be confidentially information of
Section 74 (b) of the Freedom of
which restricts release under the
Freedom of Information Act

November 8, 1990

BY MESSENGER

Richard R. Smith, Esq.

Federal Trade Commission
Sixth and Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Hart-Scott-Rodino: Conveyance of Land
Exclusive of Improvements

Dear Dick:

This letter will confirm our telephone conversation of yesterday in which you related to me that based on the facts set forth in my letter to you of November 6, 1990, and prior interpretations rendered by the FTC Staff concerning conveyances of fee simple interests in land exclusive of the improvements thereon, the transaction described in my letter is exempt from

I very much appreciate your interest and prompt attention in this matter.

Very truly yours,

[REDACTED]

cc:

[REDACTED]