

[REDACTED]

This document contains information the confidentiality of which restricts release under the Freedom of Information Act, Section 7A (b) of the Clayton Act.

Ms. Nancy Ovuka
Compliance Analyst
Pre-Merger Notification Office

Washington, D.C. 20580

Re: **Applicability of Hart-Scott-Rodino Antitrust Improvements Act of 1976 to** [REDACTED]

Dear Ms. Ovuka:

Thank you for all your time and assistance you gave me with respect to whether the Hart-Scott-Rodino Antitrust Improvements Act of 1976 (the "Act") and the Regulations promulgated pursuant to the Act (the "Regulations") are applicable to the [REDACTED]

You have informed me that the Federal Trade Commission does not issue written opinions on these matters. Accordingly, I am writing this letter to confirm our telephone conversation that [REDACTED]

[REDACTED] with respect to providing the [REDACTED] of [REDACTED]

that the Act is not applicable to the [REDACTED] because it is not included within the definition of "entity" set forth in the Regulations at 16 CFR 801.1(a)(2). Consequently, you have indicated you do not expect the [REDACTED] of the City of [REDACTED] to apply to the FTC for a determination under the Act.

Ms. Nancy Ovuka
Compliance Analyst
Federal Trade Commission

Again, thank you for your prompt consideration and guidance in

Sincerely,

[Redacted signature]

cc:

[Redacted list of recipients]