

[REDACTED]

December 19, 1990

DIRECT DIAL NUMBER:

[REDACTED]

RECEIVED
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580
DEC 20 1990

Mary Ann Bruno, Esq.
Premerger Notification Office
Bureau of Competition
Room 303
Federal Trade Commission
Washington, D.C. 20580

Re: Premerger Notification Compliance
under the Hart-Scott-Rodino Act

Dear Ms. Bruno:

Thank you for your assistance by telephone today. I appreciated the opportunity to clarify and confirm our interpretation of the rules implementing the Hart-Scott-Rodino Act as a follow-up to my November 30, 1990 letter to Mr

with respect to acquisitions of certain kinds of real property, if a structure is deemed to be an "office building" at the time of acquisition, and the value of non-office space in that structure is \$15 million or less, the acquisition will be exempt from the requirements of the Hart-Scott-Rodino Act.

[REDACTED]

Mary Ann Bruno, Esq.

If my understanding is incorrect, please notify me as soon as possible. My phone number is stated above.

Very truly yours,

[REDACTED]

[REDACTED]

cc:

[REDACTED]

[REDACTED]