

802.64

[REDACTED]

[REDACTED]

[REDACTED]

March 16, 1992  
16 C.F.R. 802.64

Mr. Patrick Sharma

Washington, D.C. 20580.

Dear Patrick:

This letter is to confirm our telephone conversation on the afternoon of March 9, 1992 in which you informed me that the Premerger Notification Office of the Federal Trade Commission concurs with my position that the below-referenced transaction is exempt from filing pursuant to 16 C.F.R. 802.64.

As I explained to you, we are counsel to two public

[REDACTED]

Very truly yours,

[REDACTED]

I concur, but caution that that secondary acquisitions aggregated with current minority holdings may take them out of the 802.64 exemption for certain secondary acquisitions.

called [REDACTED]  
(PS) 3-17-92  
(RS) concurs