

Section 7A(c)(1) of the HSR Act.

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April 28, 1992

VIA TELECOPY

Premier Notification Office
Bureau of Competition
Room 303
Federal Trade Commission
Washington, DC 20580

Dear Mr. Smith:

As you requested, this letter is to supplement my

difference is essentially form over substance.

A finance lease is a lease which calls for monthly rent

be an addendum which would provide an option for the lessee to

would have sale and conveyance language in the main document and

While the two terms are often used interchangeably

express or manufacture of the assets as part of a financing

