

801.1(b)(4), 801.1(c)(8); 802.30 (non-profit acquisition)

FEDERAL TRADE COMMISSION
PREMERGER NOTIFICATION OFFICE

JUN 18 11 03 AM '96

June 17, 1996

~~ORIGINAL VIA TELEPHONE~~
FACSIMILE

Richard D. Smith, Esq.
Premerger Notification Office
Room H-303
Federal Trade Commission
Sixth and Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Reportability of [redacted] Transaction

Dear Mr. Smith:

We very much appreciate your time and assistance during our June 7, 1996 conference call. Pursuant to your invitation, we are writing to confirm the substance of that conversation and to seek, pursuant to 16 C.F.R. § 803.30, an informal interpretation that this transaction is not reportable under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended.

We represent a not-for-profit, charitable [redacted] organization which serves [redacted] through which a church diocese conducts a major portion of its [redacted] activities [redacted] (Corp. [redacted]) has five trustees on a board of trustees, all of whom are members of the clergy in this diocese. [redacted] (Corp. [redacted]) [redacted] corporations (in one case, through an intermediary holding corporation) which, under state law, and the Bylaws of the [redacted] corporations, gives it the power to elect the [redacted] President of such [redacted] corporations.

[redacted] diocese, [redacted] members controls B.) At the present time, [redacted]

[redacted]



