

DAF/COMP(2010)12/07

Introduction

1. This report describes federal antitrust developments in the United States for the period October 1, 2008, through September 30, 2009 (“FY 2009”). It summarizes the competition enforcement and policy activities of both the Antitrust Division (“Division”) of the U.S. Department of Justice (“Department” o Div15 Tc“DC

businesses, the Commission crafted a Rule that prohibits fraud or deceit in wholesale petroleum markets, including omission of material information, that is likely to distort petroleum markets. The Commission staff prepared a compliance guide for businesses that sets out examples of Rule violations, such as false

testimony explained that pay-for-delay agreements were successfully challenged by FTC enforcement actions between 2000 and 2004, but recent appellate decisions have significantly undermined these efforts, leading to a dramatic increase in the number of these agreements.

12. The FTC is committed to use its authority under Section 5 of the Federal Trade Commission Act (“FTC Act”) to prohibit “unfair methods of competition,” including conduct that violates Section 2 of the

and 35 individuals were sentenced to a total of 25,396 days of incarceration. Another 9 individuals were sentenced to spend a total of 2,195 days in some form of alternative confinement.

20. The Division investigated 66 mergers and challenged seven of them in court; five transactions were restructured or abandoned prior to the filing of a complaint as a result of the Division's announcement that it would otherwise challenge the transaction. In addition, the Division screened a total of 463 bank mergers. The Division opened 123 civil investigations (merger and non-merger), and issued 510 civil investigative demands (a form of compulsory process). The Division filed two non-merger civil complaints. Also during FY 2009, the Division issued five business review letters.

2.2 *Antitrust Cases in the Courts*

2.2.1 *United States Supreme Court*

21. In *American Needle, Inc. v. NFL*, 130 S. Ct. 2201 (May 24, 2010), the Supreme Court addressed the issue whether a sports league structured as a joint venture of separately owned teams should be considered a single economic entity for purposes of the Section 1 concerted action requirement. The United States filed an *amicus curiae* brief in the case on September 25, 2009. The United States urged the Supreme Court to vacate the judgment of the U.S. Court of Appeals for the Seventh Circuit, which had upheld a district court's summary judgment in favor of the NFL and its separately owned teams on the grounds that they had acted as a single entity when licensing and marketing their logos and trademarks under an exclusive licensing agreement with Reebok International, Ltd. In discussing whether a sports league and its member teams should be deemed to function as a single entity, the brief argued that such treatment is only appropriate if (1) the teams and the league have effectively and legitimately merged the relevant aspect of their operations, thereby eliminating actual and potential competition among the teams; and (2) the challenged restraint does not significantly affect actual or potential competition among the teams outside their merged operations. In addition to urging the Supreme Court to vacate the judgment, the brief suggested that the case be remanded for further proceedings and application of the correct legal standard for single-entity analysis. On May 24, 2010, the Supreme Court unanimously reversed the court

was no antitrust duty to provide wholesale transport, there was no duty to provide it on any particular terms. Conversely, competition policy encourages low prices unless they are predatory as defined in *Brooke Group Ltd. v. Brown & Williamson Tobacco Corp.*, 509 U.S. 209 (1993), and there was no allegation of predatory retail pricing in the complaint. The Court declined to hold unlawful the relationship between lawfully established wholesale and retail prices of a vertically integrated firm. It remanded to the court of appeals, however, the question whether an amended complaint the plaintiffs had filed adequately pleaded predatory retail pricing.

23. The Supreme Court also denied two petitions for writs of *certiorari* filed in connection with the FTC's antitrust enforcement actions. In denying a petition for a writ of *certiorari*, the Supreme Court does

and El Al Israel Airlines Ltd. (“EL AL”) were charged with fixing air cargo prices. LAN Cargo, a Chilean company, and ABSA, a Brazilian company that is substantially owned by LAN Cargo, pleaded guilty and were sentenced to pay a single criminal fine of \$109 million. EL AL, an Israeli company, pleaded guilty and was sentenced to pay a criminal fine of \$15.7 million. In April 2009, Luxembourg-based Cargolux Airlines International S.A.; Japan-based Nippon Cargo Airlines Co., Ltd.; and Korea-based Asiana Airlines, Inc. were each charged with fixing prices for international air shipments. Asiana was also charged with fixing passenger fares for flights from the United States to Korea. Cargolux pleaded guilty and was sentenced to pay a \$119 million criminal fine. Nippon pleaded guilty and was sentenced to pay a \$45 million criminal fine, and Asiana pleaded guilty and was sentenced to pay a \$50 million criminal fine. Also in April 2009, the Division charged the former Vice President of Cargo Sales in Europe for Martinair Holland N.V with conspiring to fix prices for international air shipments. The executive pleaded guilty and was sentenced to serve eight months in jail and to pay a \$20,000 criminal fine. In August 2009, a grand jury indicted the former Vice President of Global Sales of SAS Cargo Group A/S on charges of allocating customers and coordinating increases in certain surcharges for international air shipments, conspiring to obstruct justice, and obstructing justice.

31. **Coastal Shipping:** In October 2008, the Division charged four shipping executives with allocating customers, rigging bids, and fixing prices for coastal shipping services between the United

DAF/COMP(2010)12/07

Infrastructure Rehabilitation Project, contracts for the delivery of bunkers and barriers and asphalt paving services at Bagram Airfield in Afghanistan, contract

prime contractor in return for the award of subcontracts. The conspirators also inflated prices in order to cover the kickbacks. All defendants except two have pleaded guilty.

2.4.2. *DOJ Civil Non-Merger Enforcement*

40. On September 18, 2009, the Department advised the U.S. District Court for the Southern District of New York that it should not accept the proposed class action settlement in *The Authors Guild Inc. et al. v. Google Inc.* due to concerns regarding class action, copyright, and antitrust law. The settlement agreement between Google and the authors and publisher

prior to implementation, the Department concluded that Google and Yahoo! would have become collaborators rather than competitors for a significant portion of their search advertising businesses, materially reducing important competitive rivalry between the two companies. See http://www.justice.gov/atr/public/press_releases/2008/239167.htm.

2.4.3 Enforcement of DOJ Consent Decrees

44. On January 14, 2009, the U.S. District Court for the District of Columbia found AT&T in civil

48. **Bristol-Myers Squibb Company (BMS).** On March 31, 2009, pursuant to Section 5(I) of the

DAF/COMP(2010)12/07

53. **Golf Galaxy Inc./Golf Town Canada, Inc.**

On November 24, 2008, the Department announced it would not challenge the proposed formation of Concepta Services LLC, a consortium that will offer large commercial insurance policies to companies. Concepta membership will be limited to insurers who do not have the ability to offer such large policies on their own. It will allow commercial insurers to combine their insurance capacity to jointly offer larger commercial insurance policies. The Department said that the consortium might provide a competitive new option for those businesses looking to purchase these large policies.

On October 21, 2008, the Department announced it would not challenge a proposal by RFID Consortium LLC, a group of companies each holding at least one essential ultra high frequency radio frequency identification (“UHF RFID”) patent, to jointly license patents needed to comply with standards for UHF RFID technology. UHF RFID is a type of automatic identification and data capture technology using radio frequency waves. The Department said that the proposed arrangement would likely yield procompetitive benefits because it limits the ability of the consortium’s members to use their intellectual property rights to block or delay the implementation of the UHF RFID standards, thus creating cost savings and allowing greater access to the technology.

3. Enforcement of antitrust laws and policies: mergers and concentrations

3.1 Enforcement of Pre-merger Notification Rules

56. In FY 2009, the Department, at the request of the FTC, filed two lawsuits alleging violations of the Hart-Scott-Rodino Act’s pre-merger notification requirements. First, on June 23, 2009, the DOJ announced that it had filed a complaint and proposed civil settlement in which media executive John Malone agreed to pay a \$1.4 million civil penalty for acquiring voting securities in Discovery Holding Co., a leading provider of non-fiction television entertainment, in violation of the Act’s notification and waiting requirements. Various acquisitions by Malone in 2005 through April 2008 resulted in holdings above the notification thresholds then in effect, and after Malone made a corrective filing, he made additional purchases of Discovery voting securities during the waiting period triggered by that filing. Second, on December 15, 2008, the DOJ announced that two related investment funds, ESL Partners L.P. and ZAM Holdings L.P., had agreed in a proposed settlement to pay civil penalties totaling \$800,000 for acquisitions in 2004 that resulted in each of them holding voting securities of AutoZone Inc. valued in excess of the reporting threshold then in effect. The court in both cases promptly approved the civil penalty settlements.

3.2 Significant Merger Cases

3.2.1 FTC Merger Challenges and Cases

57. **K&S AG/Dow Chemical.** In September, 2009, the Commission challenged K+S Aktiengesellschaft’s \$1.68 billion acquisition of Morton International, two major suppliers of bulk de-icing salt to state and local governments. The Commission’s complaint alleged that the transaction as originally proposed would have substantially reduced competition in both the Maine and Connecticut local markets, leading to higher prices for this essential commodity sold to local and state governments to treat roads. In order to remedy these concerns, the parties agreed to sell bulk de-icing assets in Maine and Connecticut to FTC-approved buyers. Commission staff worked closely with the Attorneys General for Maine and Connecticut in its investigation. See <http://www.ftc.gov/opa/2009/09/mortonsalt.shtm>.

58. **Thoratec Corporation/HeartWare International, Inc.** The FTC successfully challenged Thoratec’s proposed \$282 million acquisition of rival medical device maker HeartWare in July 2009, charging that the proposed acquisition would have enhanced Thoratec’s existing monopoly in the market

for left ventricular assist devices (“LVADs”) used to treat patients with advanced heart failure. Prior to its proposed acquisition, HeartWare was positioned to obtain FDA approval for its LVAD device in 2012, making it the only LVAD device to challenge Thoratec’s LVAD monopoly. The parties abandoned the transaction after the Commission announced its intention to challenge it. See <http://www.ftc.gov/opa/2009/07/thoratec.shtm>.

59. **Carilion Clinic/Center for Advanced Imaging.** On July 24, 2009, the FTC issued an administrative complaint challenging Carilion Clinic’s 2008 acquisition of two outpatient clinics in the Roanoke, Virginia area. According to the FTC’s administrative complaint, the two clinics – the Center for

the combination of the time needed to develop new drugs and gain FDA approval would typically be at least two years. Further, some of the relevant markets are relatively small and in decline, so the sales opportunities for a new entrant likely would be insufficient to warrant the time and investment needed to enter the relevant markets. The Commission's consent agreement required both Teva and Barr to sell assets in 29 U.S. markets. The rights to manufacture and market the drugs were to be divided between Watson

merger. Aluminum sheathing is used to make coaxial cables, which are purchased by cable television companies for use in transmitting high frequency broadband signals to their subscribers. Without the Department's proposed modifications, the transaction would have substantially lessened competition for the manufacture and sale of aluminum sheathing in the U.S., resulting in increased prices and reduced quality, service and innovation. At the time of the proposed merger, Indalex had been in the process of filing for bankruptcy. In 2008, Sapa's sales of aluminum sheathing were approximately \$30.7 million and Indalex's sales were approximately \$12 million. See http://www.justice.gov/atr/public/press_releases/2009/248514.htm. The court entered final judgment on January 15, 2010.

74. **PNC/National City.** On December 11, 2008, the Department announced that the PNC Financial Services Group Inc. (PNC) and National City Corporation (National City) had agreed to sell 61 of National City's branch banking offices in western Pennsylvania, with deposits totaling approximately \$4.1 billion as of June 30, 2008, in order to resolve competitive concerns about the companies' pending merger. The divestures also included the commercial loans associated with the divested branches. As a result of the acquisition, PNC was to become the fifth largest bank in the U.S., with about \$289 billion in assets and about \$180 billion in total deposits. Without the divestures, the original transaction would have reduced competition in local markets for retail banking, small business banking and middle market banking services. The proposed settlement also included a divestiture of approximately half of National City's lending and related business that served customers seeking to borrow over \$1 million in Pittsburgh, and nearly all of the same business in Erie. PNC, headquartered in Pittsburgh, reported approximately \$128 billion in assets in 2008. National City, headquartered in Cleveland, reported approximately \$151 billion in assets in 2008. See http://www.justice.gov/atr/public/press_releases/2008/240315.htm.

75. **InBev/Anheuser-Busch.** On November 14, 2008, the Department filed a proposed settlement in the U.S. District Court for the District of Columbia requiring InBev N.V./S.A. (InBev) to divest subsidiary Labatt USA, along with a license to brew, market, promote and sell Labatt brand beer for consumption in the U.S., in order to proceed with InBev's \$52 billion acquisition of Anheuser-Busch Companies Inc. The transaction, as originally proposed, would have led to higher prices of beer in the Buffalo, Rochester and Syracuse metropolitan areas of New York. Prior to the merger, Anheuser-Busch's Budweiser brands, including Budweiser and Bud Light, and InBev's Labatt brands, including Labatt Blue and Labatt Blue Light, were the two biggest selling beer brand families in these regions. The original transaction would have eliminated competition between Labatt USA and Anheuser-Busch, resulting in higher prices to consumers. See http://www.justice.gov/atr/public/press_releases/2008/239430.htm. The court entered final judgment on August 11, 2009.

76. **JBS/National Beef.** On October 20, 2008, the Department filed a civil antitrust lawsuit with the U.S. District Court in Chicago to block the proposed acquisition by JBS S.A. (JBS), the third-largest U.S. beef packer, of National Beef Packing Company LLC (National Beef), the fourth-largest U.S. beef packer. If not blocked, the merger would have substantially changed the structure of the country's beef packing industry, eliminating a competitively significant packer and placing more than 80% of domestic fed cattle (cattle ready for slaughter) packing capacity in the hands of three firms: JBS, Tyson Foods Inc., and Cargill Inc. The combined entity would have become the largest beef packer in the country, with the ability to slaughter more than one-third of the national fed cattle packing capacity. Beef packers purchase \$30 billion in fed cattle annually from feedlots, slaughter them, and process them into USDA-graded cuts of beef and other products. Packers then package the cuts as boxed beef for sale to wholesalers and grocery chains. The merger would have lessened competition among packers for the purchase of fed cattle in certain domestic regions, as well as lessened competition among packers in the production and sale of USDA-graded boxed beef nationwide. This would have resulted in lower prices paid to cattle suppliers and higher beef prices paid by consumers. On February 20, 2009, JBS and National Beef announced their decision to abandon the JBS/National Beef transaction. The Department consequently terminated the pending litigation. See http://www.justice.gov/atr/public/press_releases/2008/238382.htm.

4.2. Outreach

81. In FY 2009, the Agencies continued to provide technical assistance on competition law and policy matters to their international antitrust enforcement counterparts. The Agencies' international technical assistance programs conducted over 60 missions in over 30 countries. As part of U.S. efforts to assist China as it implements its new antitrust laws, senior FTC and DOJ officials and staff held discussions with the Chinese antitrust agencies in the United States and China. The Agencies are also

5.1.2 *FTC Staff Activities: Federal and State Regulatory Matters*

89. On March 18, 2009, in response to a request from State Representative Tom Emmer for the FTC's views, the FTC filed a comment on legislation before the Minnesota legislature that seeks to authorize collective bargaining by Minnesota health care cooperatives. The FTC staff comment observes that the bills appear to authorize anticompetitive activities, including price fixing and concerted refusals by the cooperatives and their members to deal with health plans and other purchasers. According to the comment, "Nothing in the bills is likely to prevent the harmful effects that arise from immunizing price fixing . . . [and] these bills would deprive health care consumers of the protections of the antitrust laws and the benefits of competition." The comment states that the bill is likely to harm Minnesota consumers through higher prices for health care services, higher insurance premiums, lower levels of insurance coverage, and lower wages.

90. On January 26, 2009, the FTC submitted a comment on retail electricity competition to the Arizona Corporation Commission ("ACC"). The comment, which addresses the possibility that retail electricity competition may be reopened within Arizona, brings two documents to the ACC's attention: 1) the FTC's December 2008 dynamic pricing comment to the Pennsylvania Public Utility Commission, and 2) a five-agency report to Congress (s(ate)13.aff9.52 9(mntr9.52 ic1s)11buess ((s)1522 2.950.0086 Tc0.8531 Tw[(the b)1d8(t(C)6

94. On April 17, 2009, the Department submitted comments to the Montana Supreme Court on a proposal by the Commission on the Unauthorized Practice of Law to revise the rules on the unauthorized practice of law (UPL). If adopted, the revised definition of UPL could have barred non-lawyers from competing with lawyers for a range of services and could have unnecessarily increased the prices paid by Montanans for those services. In addition, on October 10, 2008, the Department submitted comments to the Wisconsin Supreme Court regarding revisions to Supreme Court Rule 07-09 proposed by the State Bar of Wisconsin. In each of the above submissions, the Department suggested that the definition of UPL should be limited to activities for which specialized legal knowledge and training is demonstrably necessary to protect consumers and an attorney-client relationship is present.

95. On February 13, 2009, the Department submitted comments to the New Mexico Senate urging it not to enact Senate Bill 398, which would have introduced minimum service requirements for consumers of real estate brokerage services. The comments suggested that minimum service requirements harm consumers by limiting options available to consumers and protecting full-service brokers from having to respond to competition from non-traditional brokers. The comments noted that the vast majority of states allow consumers to select and purchase only those real estate brokerage services that they want, thereby allowing consumers to save thousands of dollars when selling their homes, and forcing traditional full-service brokers to offer more competitive prices, more innovative solutions and higher quality services. Enacting Senate Bill 398 would have led to reduced competition, higher prices, less innovation and lower quality services for the majority of homebuyers and sellers in New Mexico.

5.2. *DOJ and FTC Trade Policy Activities*

96. Both the Division and the FTC are involved in interagency discussions and decision-making with respect to the formulation and implementation of U.S. international trade and investment policy as concerns competition policy. The Agencies participate in interagency trade policy discussions chaired by the Office of the U.S. Trade Representative, and provide antitrust and other legal advice to U.S. trade agencies. The Antitrust Division also works with other Justice components (including the Civil, Criminal, and Environment and Natural Resources Divisions) on international trade and investment issues that affect those components or the Department as a whole, such as the recent review of the “model” U.S. bilateral investment treaty.

97. Both the FTC and DOJ participate in bilateral and multilateral discussions and projects to improve cooperation in the enforcement of competition laws. The Agencies participate in negotiations and working groups related to regional and bilateral trade agreements. The Division and the FTC participate in competition policy discussions associated with APEC and the Trans-Pacific Partnership negotiations. The Agencies are active participants in the annual UNCTAD Intergovernmental Group of Experts meetings on competition topics of interest to developing as well as developed countries, and they have also followed the competition and intellectual property component of the World Intellectual Property Organization’s (“WIPO”) Committee on Development and Intellectual Property.

98. The Division co-chairs (with the Office of the U.S. Trade Representative) and the FTC participated in the Cross-Sectoral Working Group under the U.S.-Japan Regulatory Reform and Competition Policy Initiative. In these discussions, the United States has urged the Japanese government to take a variety of actions to strengthen its enforcement of Japan’s antimonopoly law, take effective measures to eliminate bid rigging, make its administrative procedures more fair and open, and accelerate an effective program of deregulation to open markets to competition.

6. New studies related to antitrust policy

6.1 *FTC Conferences, Reports, and Economic Working Papers*

6.1.1. *Conferences and Workshops*

99. **How Will Journalism Survive the Internet Age?** On December 1-2, 2009, and March 9-10, 2010, the FTC held workshops to consider how the Internet has affected journalism. Representatives from print, online, broadcast and cable news organizations, academics, consumer advocates, and other new media representatives discussed how journalism will evolve in the future as consumers increasingly turn to the Internet for news and information. The workshops considered a wide range of issues, including the economics of journalism in print and online; the wide variety of new business and non-profit models for journalism online; factors relevant to the new economic realities for news organizations; and ways in which the costs of journalism could be reduced without reducing quality. A final workshop was held in June, 2010, and agency staff intends to publish a report on the project in the Fall of 2010. More information on the workshops is available at <http://www.ftc.gov/opp/workshops/news/index.shtml>.

100. **The Evolving IP Marketplace.** Between December 2008 and May 2009, the FTC conducted a series of hearings to explore changes in intellectual property law, patent-related business models, and new learning regarding the operation of the IP marketplace. The first hearing, held on December 5, 2008, examined broad aspects of the evolving IP marketplace, including developing business models, recent and proposed changes in remedies law, and legal doctrines that affect the value and licensing of patents. The set of hearings held on February 11-12, 2009 focused on remedies in patent infringement cases. The hearings held on March 18-19, 2009 examined the operation of markets for IP and technology, the notice function of patents, and the impact of patent policies on those markets. The April 17, 2009 hearing looked at how corporations, inventors, and patent intermediaries value and monetize patents, strategies for buying and selling patents, and the role of secondary markets for intellectual property. The May 4-5, 2009 sessions explored how markets for patents and technology operate in different industries, whether those markets operate efficiently, and how patent policy might be adjusted to respond to problems in those markets in order to better promote innovation and competition. During the course of the hearings, the Commission heard from more than 100 experts and received 47 public comments. FTC staff is drafting a report analyzing the competitive implications of information learned from the hearings. More information on the hearings is available at <http://www.ftc.gov/bc/workshops/ipmarketplace/>.

101. **Resale Price Maintenance under the Sherman Act and the Federal Trade Commission Act.** In February and May 2009, the FTC held a series of workshops to explore, for the purposes of enforcing Section 1 of the Sherman Act and Section 5 of the FTC Act, how to best distinguish between uses of resale price maintenance (RPM) that benefit consumers and those that do not. More information on the workshops is available at <http://www.ftc.gov/opp/workshops/rpm/>.

102. **Emerging Health Care Competition and Consumer Protection Issues.** On October 30, 2008, the FTC held two public workshops and roundtables on two distinct areas in which competition and consumer protection policies are implicated: (1) competition among health care providers based on quality information; and (2) competition provided by developing an abbreviated regulatory approval pathway for follow-on biologic drugs. More information on the roundtables is available at <http://www.ftc.gov/bc/workshops/hcbio/index.shtml>.

103. **HSR Premerger Notification.** In recognition of the 30th anniversary of the HSR Act, the FTC hosted a workshop on October 23, 2008, on the basics of HSR premerger notification, covering such topics as how to determine whether premerger notification is required and how to prepare an HSR filing. More information about the workshop is available at <http://www.ftc.gov/bc/workshops/hsr/>.

104. **Section 5 as a Competition Statute.** The FTC hosted a workshop on October 17, 2008 to consider the appropriate scope of the prohibition of “unfair methods of competition” in Section 5 of the FTC Act. Participants in the workshop considered the scope of Section 5 in light of legal precedent, economic learning, and changing business practices in a global and high-tech economy. The workshop focused on three subject areas: (1) the history of Section 5, including Congress’s enactment, the FTC’s enforcement, and the courts’ response; (2) the range of possible interpretations of Section 5; and (3) examples of business conduct that may be unfair methods of competition addressable by Section 5. Participants included members of the legal, academic, and business communities. More information about the workshop is available at <http://www.ftc.gov/bc/workshops/section5/index.shtml>.

6.1.2 *Studies and Reports*

105. **Authorized Generics: An Interim Report.** On June 24, 2009, the FTC published the first set of results from a study conducted to examine the short-term and long-term effects of “authorized generics” on competition in the prescription drug marketplace. An authorized generic exists when a pharmaceutical manufacturer sells a drug under both a brand-name and generic label. The interim report addressed effects of authorized generic competition on wholesale and retail generic prices during the Hatch-Waxman Act’s 180 days of marketing exclusivity, as well as effects on the revenues and sales quantities of independent generics during that period. The FTC conducted the study in response to requests from Congress as issues related to generic drug competition are relevant to current legislative debates and health care reform. The

Steven Tenn and John M. Yun, The Success of Divestitures in Merger Enforcement: Evidence from the J&J-Pfizer Transaction, April 2009.

Aileen Thompson, The Effect of Hospital Mergers on Inpatient Prices: A Case Study of the New Hanover-Cape Fear Transaction, January 2009.

Deborah Haas-Wilson and Christopher Garmon, Two Hospital Mergers on Chicago's North Shore: A Retrospective Study, January 2009.

Steven Tenn, The Price Effects of Hospital Mergers: A Case Study of the Sutter-Summit Transaction, November 2008.

6.2. Department of Justice Conferences, Reports, and Economic Working Papers

6.2.1. Conferences and Workshops

109. The Department issued a report on November 17, 2008, highlighting the expanded product

	FTE	Amount (\$ in thousands)
<i>Regional Offices</i>	---	---
Nonmerger Enforcement	105.1	17,535.4
<i>Bureau of Competition</i>	74.3	12,741.2
<i>Bureau of Economics</i>	16.1	2,571.7
<i>Regional Offices</i>	14.7	2,222.5
Nonmerger Compliance	2.2	317.6
<i>Bureau of Competition</i>	2.2	317.6
<i>Bureau of Economics</i>	0.0	0.0
<i>Regional Offices</i>	---	---
Antitrust Policy Analysis	9.5	1,132.4
<i>Bureau of Competition</i>	---	---
<i>Bureau of Economics</i>	9.5	1,132.4
<i>Regional Offices</i>	---	---
Other Direct	25.7	3,413.0
<i>Bureau of Competition</i>	18.0	2,765.9
<i>Bureau of Economics</i>	7.6	647.1
<i>Regional Offices</i>	0.1	---
Support	134.3	46,799.3