

**ASSOCIATION YEAR
2008-2009**

CHAIR
James A. Wilson
52 East Gay Street
Columbus, OH 43216

CHAIR ELECT
Ilene Knable Gotts
51 West 52nd Street
New York, NY 10019

VICE CHAIR
Allan Van Fleet
Suite 1800 Wells Fargo Plaza
1000 Louisiana Street
Houston, TX

**SECRETARY AND
COMMUNICATIONS OFFICER**
Richard G. Parker
Washington, DC

COMMITTEE OFFICER
Richard M. Steuer
New York, NY

FINANCE OFFICER
Keith D. Shugarman
Washington, DC

INTERNATIONAL OFFICER
H. Stephen Harris, Jr.
Atlanta, GA

PROGRAM OFFICER
Christopher B. Hockett
Menlo Park, CA

PUBLICATIONS OFFICER
Debra J. Pearlstein
New York, NY

SECTION DELEGATES
Joseph G. Krauss
Washington, DC

Theodore Voorhees, Jr.
Washington, DC

IMMEDIATE PAST CHAIR
Kathryn M. Fenton
Washington, DC

COUNCIL MEMBERS
Stephen Calkins
Detroit, MI

Patricia A. Conners
Tallahassee, FL

Alicia L. Downey
Boston, MA

Michael G. Egge
Washington, DC

Howard Feller
Richmond, VA

Deborah A. Garza
Washington, DC

Kenneth L. Glazer
Washington, DC

Brian R. Henry
Atlanta, GA

Jonathan M. Jacobson
New York, NY

Bernard A. Nigro, Jr.
Washington, DC

Mark S. Popofsky
Washington, DC

J. Robert Robertson
Washington, DC

Randolph W. Tritell
Washington, DC

John E. Villafranco
Washington, DC

Gary P. Zanfagna
Morristown, NJ

**NON-U.S. LAWYER
REPRESENTATIVE**
Calvin S. Goldman
Toronto, ON

**NON-LAWYER
REPRESENTATIVE**
David T. Scheffman
Washington, DC

DOJ REPRESENTATIVE
Thomas O. Barnett
Washington, DC

FTC REPRESENTATIVE
William E. Kovacic
Washington, DC

JUDICIAL REPRESENTATIVE
Lewis A. Kaplan
New York, NY

**STATE ATTORNEYS
GENERAL REPRESENTATIVE**
Robert L. Hubbard
New York, NY

**BOARD OF GOVERNORS
REPRESENTATIVE**
Paulette Brown
Madison, NJ

**YOUNG LAWYERS
DIVISION REPRESENTATIVE**
Andrea M. Agathoklis
Washington, DC

SECTION DIRECTOR
Joanne Travis
Chicago, IL
(312) 988-5575
(312) 988-5637
Travisj@staff.abanet.org

AMERICAN BAR ASSOCIATION

Section of Antitrust Law

321 North Clark Street
Chicago, IL 60654-7598
(312) 988-5550

FAX: (312) 988-5637

E-mail: antitrust@abanet.org

<http://www.abanet.org/antitrust>

April 15, 2009

Via E-mail and Express Mail

Mr. Matthew Kellison
Senior Competition Law Officer
Competition Bureau
50 Victoria Street
Gatineau, Quebec
K1A 0C9

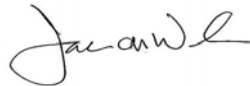
Dear Mr. Kellison:

On behalf of the American Bar Association Sections of Antitrust Law and International Law we are pleased to submit the attached comments to the Canadian Competition Bureau on its *Draft Updated Enforcement Guidelines on the Abuse of Dominance Provisions (Sections 78 and 79 of the Competition Act)*.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,



James A. Wilson
Chair, Section of Antitrust Law



Aaron Schildhaus
Chair, Section of International Law