

ASSOCIATION YEAR
2007-2008

CHAIR

Kathryn M. Fenton
51 Louisiana Avenue, NW
Washington, DC 20001

CHAIR ELECT

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

VICE CHAIR

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

**SECRETARY AND
COMMUNICATIONS OFFICER**
Debra J. Pearlstein
New York, NY

COMMITTEE OFFICER

Allan Van Fleet
Houston, TX

FINANCE OFFICER

Robert M. Langer
Hartford, CT

INTERNATIONAL OFFICER

H. Stephen Harris, Jr.
Atlanta, GA

PROGRAM OFFICER

Christopher B. Hockett
San Francisco, CA

PUBLICATIONS OFFICER

Keith D. Shugartman
Washington, DC

SECTION DELEGATES

Richard M. Steuer
New York, NY

Theodore Voorhees, Jr.
Washington, DC

IMMEDIATE PAST CHAIR

Joseph Angland
New York, NY

COUNCIL MEMBERS

Stephen Galkins
Detroit, MI

Patricia A. Conners
Tallahassee, FL

David H. Evans
Washington, DC

Howard Feller
Richmond, VA

Deborah A. Garza
Washington, DC

Brian R. Henry
Atlanta, GA

Jonathan M. Jacobson
New York, NY

Joseph G. Krauss
Washington, DC

Neil P. Motenko
Boston, MA

Bernard A. Nigro, Jr.
Washington, DC

Leslie C. Overton
Washington, DC

Randolph W. Tritell
Washington, DC

John E. Villafranco
Washington, DC

Daniel M. Wall
San Francisco, CA

Gary P. Zanfagna
Morristown, NJ

**NON-U.S. LAWYER
REPRESENTATIVE**

Calvin S. Goldman
Toronto, ON

DOJ REPRESENTATIVE

Thomas O. Barnett
Washington, DC

FTC REPRESENTATIVE

Deborah Platt Majoras
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

May 22, 2008

Via E-mail and Express Mail

Annie Galipeau
Senior Competition Law Officer
Competition Bureau
Place du Portage 1
50 Victoria Street
Gatineau, Quebec K1A 0C9

Re: Comments to Canadian Competition Bureau on its Draft Bulletin on Corporate Compliance Programs

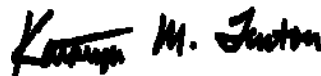
Dear Ms. Galipeau:

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 Bulletin on Corporate Compliance Programs.

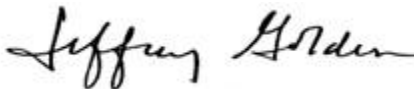
Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American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

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

Sincerely,



Kathryn M. Fenton
Chair, Section of Antitrust Law



Jeffrey B. Golden
Chair, Section of International Law

Attachment