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2017-2018

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AMERICAN BAR ASSOCIATION

Section of Antitrust Law

321 North Clark Street

Chicago, IL 60654-7598

(312) 988-5550

E-mail: antitrust@americanbar.org

www.ambar.org/antitrust

June 7, 2018

Via e-mail to:

consultazione.compliance@agcm.it

Ill. ma Autorità Garante della Concorrenza e del Mercato

Direzione Generale per la Concorrenza

Piazza Verdi 6/A

Roma

**Re: Joint Comments on Italian Competition Authority Draft Guidelines
on Compliance Programs**

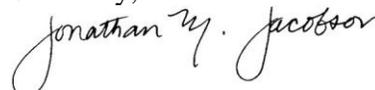
Dear Sir/Madam:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached joint comments to the Italian Competition Authority's request for public comments regarding its Draft Guidelines on 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 policy of the American Bar Association.

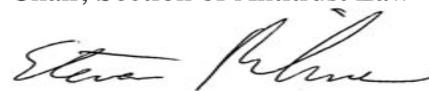
We appreciate your consideration of the Sections' comments on this important initiative. If you have any comments or questions after reviewing our comments, we would be happy to discuss them.

Sincerely,



Jonathan M. Jacobson

Chair, Section of Antitrust Law



Steven M. Richman

Chair, Section of International Law

Attachment