April Tabor Secretary Federal Trade Commission 600 Pennsylvania Avenue NW Suite CC-5610 (Annex C) Washington, DC 20580

Re: Request for Extension on Proposed Rulemaking for the HSR Filing Process (Matter No. P239300)

Dear Ms. Tabor:

On behalf of our members, we request that the Federal Trade Commission and the Department of Justice extend the comment period to the above-referenced rulemaking (the "Proposal") for an additional 60 days. Collectively, our associations represent a wide range of members that routinely evaluate and file HSR-reportable transactions as prospective purchasers, sellers, investors, or facilitators.

An extension would serve the interests of both the public and the agencies by allowing adequate time for more fulsome responses on a proposal that could reshape U.S. merger policy, business activity, and capital markets. A typical year sees more than 2,000 mergers whose aggregate transaction value approaches \$3 trillion. The Proposal acknowledges that the new forms would almost quadruple average preparation time in each instance, imposing costs that "would be significant and impose additional burden on some filing parties." In its 133 pages, the Proposal solicits feedback on numerous specific ideas that touch upon complex questions of markets, labor, capital, regulatory costs, and attorney-client privilege. Every question could, by itself, easily produce a highly substantive and lengthy response.

The agencies are best served if the Proposal receives quality feedback. To allow sufficient time for detailed comments, we ask that you grant an extension.

Thank you for your consideration of this matter.

Sincerely,

American Coatings Association American Hospital Association American Hotel & Lodging Association American Investment Council

Alternative Investment Management Association

Biotechnology Innovation Organization (BIO)

Business Roundtable

Consumer Brands Association

Consumer Technology Association (CTA)

Engine

Federation of American Hospitals

ITI - Information Technology Industry Council

Managed Funds Association

Metals Service Center Institute

NACS | Advancing Convenience & Fuel Retailing

Pharmaceutical Research and Manufacturers of America (PhRMA)

Retail Industry Leaders Association

Securities Industry and Financial Markets Association

SIFMA Asset Management Group

Software & Information Industry Association (SIIA)

TechNet

US Chamber of Commerce