

July 17, 2023

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