

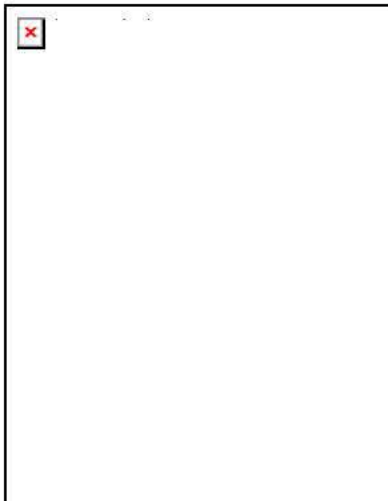
[REDACTED]

From: Thomas Ph.D., Kenneth H. [REDACTED]
Sent: Wednesday, November 02, 2016 11:06 AM
To: ATR-FRC-InternationalGuidelines
Cc: Thomas Ph.D., Kenneth H.; [REDACTED]
Subject: Proposed alternative to HHI methodology, Ken Thomas

Please consider this my formal comment to the DOJ's Antitrust Division and the FTC on the proposed Antitrust Guidelines for Intl. Enf and Coop. Very briefly, I propose an alternative to the current HHI competition index which is flawed in many ways with recent increases in concentration across most industries worldwide. My alterantnive MDI methodology is based on the Market Domination Index where the focus is on the actual or potential domination of a specific market rather than the broader based HHI approach. The MDI methodology is described in detail in The CRA Handbook, McGraw Hill, NY, 1998. Thank you for this opportunity to submit this comment.

Kenneth H. Thomas, Ph.D.
www.CRAHandbook.com

[REDACTED]



Welcome to the Home of the CRA
Handbook

www.crahandbook.com

Find out about the CRA Handbook: Community Reinvestment Act, banking, federal regulations, finance, fair lending, bank compliance, bank regulation