

December 31, 2009

Via Hand Delivery

Legal Policy Section
Antitrust Division
U.S. Department of Justice
450 5th Street, NW, Suite 11700
Washington, DC 20001

Re: Comments Regarding Agriculture and Antitrust Enforcement Issues in
Our 21st Century Economy

Dear Sir or Madam:

Enclosed please find two paper copies of a paper, "Competition and Innovation in American Agriculture: A Response to the American Antitrust Institute's 'Transgenic Seed Platforms: Competition Between a Rock and a Hard Place?'" The paper was prepared by Arnold & Porter LLP and Cornerstone Research on behalf of Monsanto Company for consideration in connection with the upcoming workshops concerning competition in the agricultural industry.

An electronic copy of the paper in native Microsoft Word format has been emailed to agriculturalworkshops@usdoj.gov.

We hope you find the paper useful.

Sincerely,



Kenneth Letzler
Jonathan Gleklen

cc: Vandy Howell, Dina Older Aguilar
(Cornerstone Research)