



GPA

Global Privacy Assembly

Digital Citizen and Consumer Working Group

Report – July 2022

Submitted on behalf of the DCCWG by the co-chairs - Office of the Privacy Commissioner of Canada (OPC Canada) and Office of the Australian Information Commissioner (OAIC)

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Executive summary

In 2021 the Digital Citizen and Consumer Working Group (DCCWG) became a permanent working group of the Global Privacy Assembly (GPA). As the digital economy continues to blur and challenge traditional regulatory boundaries, the GPA recognised the importance of exploring the intersections of, and promoting regulatory cooperation between, the regulatory spheres of privacy, consumer protection and competition/anti-trust. The work of the DCCWG goes to the heart of Pillar #2 in the GPA's Strategic Plan: regulatory and enforcement cooperation.¹ As social and economic interactions increasingly take place in the digital environment, concerns about the use of, and access to, personal information by global digital platforms have emerged. The GPA recognises that data protection and privacy authorities cannot regulate alone, particularly where the regulated activities fall within the scope of intersecting regulatory regimes. The work of the DCCWG to identify, explore and develop links between regulatory spheres to advance cross-regulatory cooperation has never been more important in achieving the best possible outcomes for individuals.

In the past year, the DCCWG has continued to observe growing interest in cross-regulatory cooperation in panel discussions, workshops, conferences and other international forums. Regulators across the globe are grappling with data protection issues that overlap with competition, consumer protection and a range of other regulatory spheres that are yet to be explored. The role of the DCCWG in unravelling these issues, identifying opportunities for coordination and developing practical tools for cooperation will prepare and equip GPA members to approach regulatory counterparts with understanding and purpose.

The growing relevance of the DCCWG's work is reflected in the growth of our members. Over the past year our network of members and observers has grown to 20 agencies. The DCCWG is sought after for domestic and international speaking engagements that explore the value of cross-regulatory cooperation, providing an opportunity to promote awareness of intersection issues in various forums. This includes conferences, network meetings, professional association events and government presentations. The value of this sensitisation work in maximising the effectiveness of regulatory actions concerning the digital economy is reflected in the DCCWG's 2021–2022 workplan.

Looking ahead, the DCCWG is eager to build on the work it has done in 2022 to deliver our mandate under the 2021–2023 GPA Strategic Plan and foster 'a global regulatory environment of high standards of data protection and privacy'.²

We are pleased to present this report at the 44th GPA Closed Session and we hope that members find our contributions useful to their work in the evolving digital economy.

Office of the Australian Information
Commissioner

Co-chair

Office of the Privacy Commissioner,
Canada

Co-chair

¹ Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, pp 15–16.

² Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, pp 15–16.

Introduction

The Digital Citizen and Consumer Working Group (DCCWG) explores intersections between privacy and other regulatory spheres in the digital economy. The work of the DCCWG supports the Global Privacy Assembly's (GPA) Strategic Priorities in relation to regulatory and enforcement cooperation, which aims to foster 'a global regulatory environment of high standards of data protection and privacy, and capacity building'.³

The Working Group was initially established in 2017 through a resolution passed by the 39th *International Conference of Data Protection and Privacy Commissioners* (now the GPA). The DCCWG's original mandate was to explore the intersection between privacy and consumer protection issues, laws and concepts.

In 2019, the GPA adopted a resolution that expanded the mandate of the DCCWG to study intersectional issues between the privacy and competition regulatory spheres.⁴

In October 2021, the DCCWG became a permanent working group of the GPA in recognition of the accelerated relevance of the DCCWG's work and the important role cross-regulatory cooperation will play in the coming years.⁵ Under the 2021–2023 GPA Strategic Plan, the DCCWG is mandated to:

- Identify, explore and develop links between the areas of enforcement cooperation and cross-regulatory cooperation. This should include engagement with networks of other regulatory bodies in sectors such as consumer protection, competition or anti-trust; and
- Enhance the focus on practical cooperation across different sectoral regulators, initially by the development of a compendium of best practice arrangements for cross-regulatory cooperation.⁶

Note: The above mandate components link to the GPA's Strategic Priority 1, 2 and 3.⁷

The DCCWG is also mandated, along with all the working groups, to:

- deepen engagement with existing stakeholders by actively seeking new activities for more significant impact, voice and influence.
- consider emerging technologies relating to their area of work and any potential privacy or data protection concerns, and include in their annual forward plans where appropriate; and
- consider whether and how the issue of children's privacy and the exercise of their digital rights intersects with their work, and where appropriate include in their annual forward plan.

³ Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, pp 15–16.

⁴ [Resolution to support and facilitate regulatory co-operation between data protection authorities and consumer protection and competition authorities to achieve clear and consistently high standards of data protection in the digital economy](#), passed at the 41st International Conference of Data Protection and Privacy Commissioners.

⁵ Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, p 16.

⁶ As above p 17.

⁷ Strategic Priority 1: advancing global privacy in an age of accelerated digitalisation.

Strategic Priority 2: maximise the GPA's voice and influence.

Strategic Priority 3: capacity building for members.

The purpose of this report is to inform the GPA of the work undertaken by the DCCWG over the 2022 year. This report sets out the work done under the DCCWG 2021–22 workplan. It also outlines the future priorities of the Working Group as it looks to further its understanding of intersectional issues associated with the interaction of privacy, consumer protection and competition, and explores other emerging areas of regulatory intersection with privacy.

The current members and/or observers of the DCCWG are as follows:

- Office of the Australian Information Commissioner (co-chair)
- Office of the Privacy Commissioner of Canada (co-chair)
- Belgian Data Protection Authority, Belgium
- Commission Nationale de l'Informatique et des Libertés (CNIL), France (new member)
- Datatilsynet, Denmark
- Datatilsynet, Norway
- European Data Protection Supervisor, Europe
- Federal Commissioner for Data Protection and Freedom of Information, Germany
- Federal Trade Commission, United States
- Information Commissioner's Office, United Kingdom
- National Privacy Commission, Philippines
- The Superintendence of Industry and Commerce, Colombia
- Commissioner of Personal Data Protection, Senegal
- National Commission for the Protection of Personal Data, Gabon
- State Inspector's Service of Georgia, Georgia
- National Institute for Transparency, Access to Information and Personal Data Protection (INAI), Mexico
- The European Consumer Organisation (BEUC) (observer)
- Authority for Consumer & Markets, Netherlands (observer)
- The Personal Data Protection Commission, Singapore (observer)
- Office of the Privacy and Civil Liberties, United States (new observer)

Working Group activities

The DCCWG's 2021–2022 Workplan sets out five workstreams, which are to be delivered across 2022 and 2023. The DCCWG will carry over work from its 2021–2022 Workplan to its 2022–2023 Workplan as required:

1. Exploring, mapping and understanding the intersections between the regulatory spheres of privacy, consumer protection and competition
2. Continued sensitisation of authorities and stakeholders across regulatory spheres
3. Identifying collaboration strategies and tools where they exist, and advocating for and recommending them where they do not
4. Facilitating collaboration across privacy, consumer protection and competition
5. Environmental scan of other regulatory areas of intersection with privacy

The DCCWG has had a busy year and is experiencing ever-increasing interest in its work. This section of the report provides an overview of the work undertaken during the first year of the DCCWG's workplan.

Throughout the 2022 reporting year, the DCCWG regularly reported to the GPA Strategic Direction Sub-Committee (SDSC) on the progress of its work through presentations at SDSC "Deep Dive" meetings and written quarterly reports. The DCCWG co-chairs presented at the 12th meeting of the SDSC in May 2022. The co-chairs' report was well received by the SDSC, who were interested in the DCCWG's work to sensitise authorities across regulatory spheres to its work on regulatory intersections and cooperation.

1. Exploring, mapping and understanding intersections

In 2020–2021 the DCCWG completed a "Deep Dive" to further our understanding of the intersections between privacy and competition as well as the complements and tensions between the two regulatory spheres.

The first workstream of the 2021–2022 workplan builds on this work with a specific focus on analysing the broader implications of Mergers & Acquisitions outcomes on individual's privacy. As workstream lead, the UK ICO has scoped out a methodology to carry out this study. Part of this will include a report analysing potential implications of M&A on individuals' privacy, which will be finalised over the 2022–2023 year.

This workstream also includes monitoring international activities that demonstrate the intersections between regulatory regimes and actual collaborative actions taken by regulators across all three regulatory sectors. All relevant activities are included in the DCCWG Mapping Table, which is a DCCWG resource that enables members to find out about practical examples of regulatory intersection issues and learn how these issues are addressed by different authorities in different jurisdictions. This Mapping Table has been an ongoing project since 2017, and maps on a continuum the ever-expanding interest and recognition of cross regulatory intersections and co-operation. The 2022 edition of the DCCWG Mapping Table is presented at **Annex 1**.

Key intersection activities monitored by the Working Group in 2022:

- In May 2022, the UK Competition and Markets Authority (CMA) delivered a presentation on the Google Privacy Sandbox, namely the competition concerns associated with the initiative and the binding commitments entered into by Google. The UK ICO also mentioned that they were considering the potential privacy impacts posed by Google's proposal.
- In March 2022, the OAIC and the Australian Communications and Media Authority (ACMA), the Australian Competition and Consumer Commission (ACCC) and the Office of the eSafety Commissioner formed the Digital Platform Regulators Forum (DP-REG). The DP-REG is an initiative of independent Australian regulators to share information and collaborate on cross-cutting issues and activities on the regulation of digital platforms. This includes consideration of how competition, consumer protection, privacy, online safety and data issues intersect.
- The Digital Regulation Cooperation Forum (DRCF), of which the UK Information Commissioner's Office (ICO) is a member, published its work plan for 2022 to 2023. The DRCF has three main priorities:
 - promoting greater coherence across regulatory regimes that intersect to resolve potential tensions and offer clarity for people and industry
 - working collaboratively on areas of common interest and jointly addressing complex problems
 - working together to build capabilities, information sharing to improve current and future practices.

In 2022 to 2023, the DRCF will focus on issues such as protecting children's privacy, privacy and competition issues in online advertising and algorithmic transparency.

- The US Federal Trade Commission (FTC) opened public consultation on ways to modernise the agency's guidance to businesses on disclosures in digital advertising and marketing. The FTC is seeking to update the guidance to prevent businesses from relying on its existing provisions to justify dark patterns and other forms of digital decision deception.
- The Philippines National Privacy Commission (NPC) and the Philippine Competition Commission (PCC) signed a Memorandum of Agreement (MOA) to foster cooperation and coordination between the two regulatory agencies. The MOA enables both NPC and PCC to consult each other in the drafting and implementation of policies relating to the other's expertise.
- The German competition regulator, the Bundeskartellamt, launched an investigation into Apple's privacy rules, the APP Tracking Transparency framework, which establishes preconditions for user-tracking by third-party apps. The regulator is concerned that the framework may have anti-competitive implications and grant Apple's services an advantage over third-party apps.
- The Parliament of Canada legislated amendments to the *Competition Act* that expanded the type of conduct caught by provisions relating to abuse of dominance. The provisions now also capture conduct that negatively affects non-price considerations such as quality, choice and consumer privacy.
- The European Commission facilitated a cross-regulatory cooperative effort between the European Data Protection Board (EDPB) and the Consumer Protection Cooperation Network to produce [5 key principles of fairness in advertising towards children](#).⁸

⁸ See: https://ec.europa.eu/info/sites/default/files/5_key_principles_9_june_2022.pdf

This work supports the GPA's Strategic Priority 3 – capacity building – by providing a resource for GPA members and other regulators to draw on when seeking examples of, and potential for, cross-regulatory cooperation. Members will be able to easily identify cases of cooperation and learn best practices to take into their respective activities.

2. Continued sensitisation of authorities and stakeholders across regulatory spheres

The DCCWG has increased awareness of its work on intersection issues, and is regularly sought after to speak on this issue at international conferences.

The issue of how to address the intersections of other regulatory spheres with privacy, particularly competition and consumer protection, is now a key topic of discussion in most leading conferences and international forums. The DCCWG has observed a growing interest in and demand for exploring the topic at public events, through panel discussions and workshops, which has led to an increased awareness of intersection issues among key stakeholder industries and networks.

This work item goes towards furthering the GPA's Strategic Priority 2 – maximising the GPA's voice and influence – through engagement with various international forums to promote awareness of the GPA's work and objectives. By actively seeking opportunities for engagement with stakeholders, the DCCWG is able to enhance the influence of the GPA's work in cross-regulatory cooperation.

Key engagements in 2022:

- The DCCWG hosted a webinar in November 2021 which focused on the DCCWG's Deep Dive work. This included a presentation from Assistant Professor Erika Douglas, author of the DCCWG-commissioned report [Digital Crossroads: The Intersection of Competition Law and Data Privacy](#)⁹ and a presentation on the DCCWG's Interview Report with competition and privacy regulators on their lived experiences. SIC Colombia also presented their views and experiences as a regulator responsible for privacy, competition and consumer protection regulations.
- The DCCWG co-chairs authored [an article](#) published in the April 2022 edition of the Competition Policy International's TechREG Chronicle. The article highlighted the work of the Group and focused on some key takeaways from the Deep Dive project. The article was published in a competition journal directed at competition lawyers and regulators. It therefore represented a key opportunity to increase awareness of intersection issues and share learnings on cross-regulatory collaboration. A copy of the article is attached as **Annex 2**.
- The DCCWG co-chairs made [a submission to the US Federal Trade Commission and US Department of Justice public consultation on updates to their merger guidelines](#) in March 2022. The submission drew on the DCCWG's Deep Dive work and commented on the cross-regulatory relationship between privacy and competition regulation in the context of the consultation's queries. A copy of the submission is attached as **Annex 3**.
- The Office of the Privacy Commissioner of Canada (OPC) presented on the topic of 'International Cooperation in practice' at the Venice Privacy Symposium in April 2022. OPC Canada referred to its work with the DCCWG and addressed the importance of cross-regulatory cooperation.

⁹ See: <https://globalprivacyassembly.org/wp-content/uploads/2021/10/1.3h-version-4.0-Digital-Citizen-and-Consumer-Working-Group-adopted.pdf>

- OPC Canada presented on the topic of ‘International Collaboration’ at the IAPP Global Privacy Summit 2022 in Washington D.C. and highlighted the role of the DCCWG in facilitating collaboration across regulatory spheres.
- OPC Canada discussed the work of the DCCWG in two interviews given to the MLEX Insight and Cybersecurity Law report.¹⁰
- OPC Canada presented in APPA 56 and APPA 57, updating stakeholders on the work of the DCCWG and the value of understanding intersections across regulatory regimes and facilitating collaboration amongst regulators.
- The OAIC participated in a panel discussion titled ‘The path to coherent enforcement in the digital ecosystems: protecting markets, societies and democracy’ at the European Data Protection Supervisor (EDPS) Conference in June 2022. The OAIC discussed the work of the DCCWG and how regulatory cooperation and consultation can help achieve objectives across frameworks.
- The OPC Canada presented on the activities of the DCCWG at a G7 meeting held on 10 June. The intersection between privacy and competition was one of the G7’s provocations in 2021 leading to a “call to action” for cross-regulatory collaboration. As a result, a briefing was provided on intersection developments including examples of cross-regulatory cooperation in practice and ways to improve cross-regulatory cooperation.

3. Identifying collaboration strategies and tools where they exist, and advocating for and recommending them where they do not

With the greater overlap of regulatory spheres in the digital economy and the increasing number of cross-regulatory collaborations, the DCCWG views it as paramount to understand the factors underpinning successful collaborations, as well as the tools, mechanisms and strategies employed by different authorities. The work done pursuant to the third workstream will support the GPA’s Strategic Priority 1 – advancing global privacy in an age of accelerated digitisation, and Strategic Priority 3 – capacity building.

To this end, the DCCWG is currently working with the International Enforcement Cooperation Working Group (IEWG) to develop a survey to be sent to the GPA membership. The objective of the survey is to invite GPA members to describe their experience with successful collaborations, be they among privacy and data protection authorities or collaborations between data protection/privacy authorities and authorities from other regulatory spheres. Identifying barriers that have impeded collaboration will also be a survey objective. The DCCWG/IEWG will develop case studies of successful collaborations for inclusion in the Enforcement Cooperation Handbook and/or the GPA’s Enforcement Cooperation Repository, and identify what tools and strategies were employed to facilitate these collaborations. The DCCWG hopes to use these insights to identify new strategies and tools that can enhance the effectiveness of future collaborative enforcement and support advocacy for change in jurisdictions where such collaborations are not possible.

4. Facilitating collaboration across privacy, consumer protection and competition

Building on the lessons learnt from the third workstream, the DCCWG looks to put the knowledge gained into practice by facilitating collaboration across multiple regulatory spheres.

For the fourth workstream of the DCCWG’s workplan, the DCCWG is working on developing a relationship with the International Competition Network (ICN). This workstream will support both

¹⁰ See: <https://content.mlex.com/#/content/1371398>

the GPA's Strategic Priority 2 – maximising the GPA's voice and influence, and Strategic Priority 3 – capacity building. The DCCWG aims to establish a joint ICN/GPA workshop to discuss mutual regulatory concerns. The DCCWG notes that the ICN is conducting its own exploration into the intersection of privacy/data protection and competition/anti-trust. The DCCWG hopes that by leveraging the Deep Dive work, the networks and authorities in both regulatory spheres can develop a deeper mutual understanding of each other's enforcement priorities and help foster willingness to engage in cross-regulatory collaboration.

5. Environmental scan of other regulatory areas of intersection with privacy

The ongoing expansion of the digital economy continues to disrupt traditional approaches to conducting business. It has also blurred regulatory boundaries, which has heightened the need for regulators to be able to recognise where activities might raise issues in other regulatory spaces, and to be able to cooperate to ensure holistic regulation. As the digital economy develops at an increasing rate, new areas of intersection have arisen.

The fifth workstream of the DCCWG's workplan aims to identify further regulatory spheres that intersect with privacy and data protection in a meaningful way. The DCCWG will then draw on members' views to highlight the key risks and opportunities of relevant intersections on the digital society and economy. The DCCWG has commenced work on this item by developing a survey to be circulated to the GPA membership. The objective of the survey is to understand the members' experiences with emerging areas of regulatory intersection.

The DCCWG will also engage with members of the GPA Reference Panel to explore their perspectives on emerging regulatory intersections with privacy and leverage their understanding of the digital landscape to identify practices for addressing these intersections in a joined-up regulatory approach.

This workstream will support the GPA's Strategic Priority 1 – advancing global privacy in an age of accelerated digitalisation – by identifying and exploring links between areas of privacy intersection. This will enhance global understanding of the implications that accelerated digitalisation has on data protection and privacy, as well as emerging societal considerations such as online safety.

Forward looking plan 2022–2023

In 2022–23 the DCCWG will continue to implement our workplan, with a particular focus on delivering the items set out in the 2021 – 2023 GPA Strategic Plan.¹¹

	Objective	Forward Plan Activities
1.	To explore, map and better understand the growing intersection of the regulatory spheres of privacy, consumer protection and competition.	<p>DCCWG Report analysing potential implications of M&A on individuals' privacy.</p> <p>The DCCWG will continue to map and analyse cases whether there is overlap between privacy, consumer protection, competition or anti-trust.</p>
2.	To sensitise authorities across regulatory spheres to the intersection, such that a privacy authority recognises a competition issue when they see it, and vice versa.	<p>The DCCWG will continue to sensitise key external stakeholders to intersection issues, as an important ongoing activity, which contributes to the GPA's Strategic Priority of maximising the GPA's voice and influence.</p> <p>The DCCWG will reach out to relevant members of the Reference Panel to seek their input/perspectives on pursue opportunities in their spheres of influence. The DCCWG will also approach "sister" networks and explore the possibility of presenting to their members or hosting joint events.</p>
3.	Identify collaboration strategies and tools where they exist, and advocate for and recommend them where they do not.	The DCCWG will continue to identify strategies and tools used for regulatory collaboration through surveying the GPA membership to understand their experience with successful regulatory collaboration. The DCCWG will use the results of the survey to produce successful case studies, identify regulatory strategies and tools that work, and advocate for new tools, strategies, and reforms to facilitate more cross-regulatory collaborations.

¹¹ Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, pp 15–16.

4.	<p>Facilitating collaboration across all three regulatory spheres</p>	<p>The DCCWG will continue to develop strong relationships with other regulatory networks including holding an event or activity with counterpart networks such as ICN or ICPEN. This could take form of a cross-network joint even and/or workshop.</p> <p>The DCCWG will also summarise the key takeaways from communications with other regulatory networks, and the survey under Workstream 3 above, and add them to the GPA Enforcement Cooperation Handbook and/or Enforcement Cooperation Repository.</p>
5.	<p>Environmental scan of other regulatory areas of intersection with privacy</p> <p>As highlighted in the GPA’s Strategic Plan, the DCCWG notes the importance of future cooperation with regulators from other sectors, especially where there may be overlapping or intersecting regulatory regimes. An environmental scan of any regulatory spheres (i.e. e-safety and telecom) intersecting with privacy and data laws would identify, and ordinarily assess other regulatory spheres according to risks, opportunities and potential impact on the digital society and economy.</p>	<p>The DCCWG will identify and assess other areas of regulatory intersection with privacy in the digital society and economy, beyond competition/ anti-trust and consumer protection. The DCCWG will explore how cross-regulatory collaboration can address the synergies and tensions between privacy and other regimes. For example, the working group is aware of the growing recognition of the interaction between online safety and children’s privacy and will look to exploring the risks and opportunities posed by this intersection. The DCCWG will also conduct a survey of the GPA membership to understand members’ experiences on emerging instances of intersections with privacy. The DCCWG will reach out to the Reference Panel to discuss their perspectives on novel intersections with privacy.</p> <p>A Report will be produced summarising the results of the above Environmental Scan.</p>

Conclusion

Data sits at the centre of our evolving digital economy and influences the compliance and enforcement activities of multiple regulatory frameworks. The work of the DCCWG is to understand and promote cross-regulatory collaboration practices that can achieve optimal regulatory outcomes for individuals.

In continuing its mandate under the 2021–23 GPA Strategic Plan, the DCCWG will work to develop its understanding of the ways that regulatory cooperation can deliver high standards of data protection. The DCCWG is eager to explore other regulatory spheres, beyond competition/anti-trust and consumer protection, that intersect with privacy. Identification of emerging areas of intersection and consideration of their unique synergies is important to keep up with the dynamic digital economy in which personal data is handled. In so doing, the DCCWG supports a “global regulatory environment with clear and consistently high standards of data protection”.¹²

In 2021–2022 the DCCWG has successfully engaged in extensive sensitisation work to promote an understanding of intersection issues and share knowledge about the opportunities posed by cross-regulatory cooperation. We have observed the increasing awareness, by regulators, international organisations and global networks, of this topic. We have also seen many practical examples of cross-regulatory cooperation in action. We are pleased to be a leading voice and contribute to the international discussion on this issue and look forward to continuing to work with regulatory authorities, industry and civil society.

To date our work has revealed the tensions that exist between privacy, competition and consumer protection, but it has also emphasised the shared challenges and common policy objectives of these regimes. It is clear to us that there is an opportunity, in exploring intersection issues further, to gain a better understanding of how regulators can work together, across regulatory lines, to achieve shared goals to the holistic benefit of our collective citizenry. We look forward to advancing the strategic goals of the GPA through our cooperation focus.

The DCCWG co-chairs would like to thank all members of the DCCWG for their valuable input and support in progressing the mandate of the DCCWG, and producing positive outcomes for citizens and consumers in the increasingly digital economy. We look forward to continuing this important work in the final year of the 2021–2023 GPA Strategic Plan.

¹² Global Privacy Assembly, [Strategic Plan 2021–2023](#), GPA, 2021, pp 15- 16.

Annex 1

DCCWG Mapping Table of regulatory intersections
and actual collaborative actions

Annex 2

Regulating the Digital Economy – why privacy and competition authorities should talk to each other,
by Melanie Drayton and Brent Homan, co-chairs
of the DCCWG

Annex 3

*DCCWG submission to the Federal Trade
Commission and US Department of Justice Merger
Guidelines Consultation*