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**DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS
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The Role of Competition Policy in Promoting Economic Recovery – Summaries of contributions

2 December 2020

This document reproduces summaries of contribution submitted for Item 2 of the 134th OECD Competition Committee meeting on 1-3 December 2020.

More documents related to this discussion can be found at
<http://www.oecd.org/daf/competition/promoting-economic-recovery.htm>

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Summaries of contributions

This document contains summaries of the various written contributions received for the discussion on the role of competition policy in promoting economic recovery (134th Meeting of the Competition Committee on 1-3 December 2020). When the authors did not submit their own summary, the OECD Competition Division Secretariat summarised the contribution. Summaries by the OECD Secretariat are indicated by an *.

BIAC

The primary economic effects of the COVID-19 crisis are a reduction of the private sector's economic output, economic growth and productive capacity together coupled with an increase in business uncertainty and risk. This includes a very significant loss of jobs across many countries.

Business at OECD submits that the State's role in stimulating economic recovery should be focused on supporting economic output and not one which overly regulates the private sector or establishes unnecessary barriers to trade and investments or acquisitions from foreign based entities. Such an approach may well discourage private sector investment, innovation and growth at a time when it is of critical importance.

Governments should recognise that the private sector is typically more reactive to market signals and is better incentivised to pursue efficiencies and correct market failures as a result of the pandemic.

Governments, however, typically have less liquidity constraints and can take a longer-term view and are, therefore, better placed to balance broader public policy objectives which are not easily commercialised or competently remedied by competition enforcement.

In relation to pursuing such broader objectives, including employment, privacy and possibly giving preferential treatment to domestic entities engaged in certain sectors such as health care, supply chains, or technology, *Business at OECD* submits that the primary focus of competition agencies should specifically be focused on maintaining competitive markets and thereby stimulating economic recovery which will ultimately lead to job creation. To do so, governments should not unnecessarily introduce regulatory initiatives that are not pro-competitive and which may cause competition agencies to depart from established standards and benchmarks. In instances where, after taking competition considerations into account, a departure may be required, clear guidance should be provided to the private sector. One such possible exception may arise in certain cases of proposed acquisitions of failing firms, as discussed below.

Brazil

This paper offers an overview of five ongoing projects being carried out in Brazil which are likely to increase competition and stimulate economic recovery after the crisis caused by the COVID-19 pandemic. Three of them require competition advocacy measures, while the other two require close monitoring for any antitrust violations.

It starts with a description of the initiatives aimed at opening the country to international trade. Free trade has always been seen as a key piece for increasing market contestability. It demands extra attention after economic crises, when interest groups get empowered.

Then, the second part discusses some aspects of tax reform proposals currently under discussion in the Brazilian Congress. The reform could end tax exemptions across different sectors and several Brazilian states, which would be good for competition since tax exemptions cause distortionary effects by inducing firms to invest in economic sectors and geographical regions with higher exemptions instead of where they would be more productive.

The third part describes PIX which is an electronic payment system that was recently launched by the Central Bank of Brazil that allows for instant money transfers. It is available for traditional financial institutions (such as banks) as well as digital banks and fintech companies (i.e., those using technology and innovation to offer alternative financial services). It is expected to substantially reduce transfer fees, making consumers and businesses less dependent on cash and debit cards, thus increasing the ability of digital banks and fintech companies to compete with traditional banks.

The open banking initiative is the next to be presented. It involves imposing banking practices to force financial institutions to provide access to their customers' transactional data (with their permission) through Application Programming Interfaces (API). This is likely to increase competition in the credit market which could significantly affect economic recovery.

The last policy addressed is the Data Protection Law which passed in 2018 and is currently being implemented. Antitrust experience with price discrimination in e-commerce and with exclusionary practices in the context of online platforms could be useful in setting out competition guidelines for data protection.

Canada

As an independent organization responsible for enforcing Canada's *Competition Act* (the Act), Canada's Competition Bureau (the Bureau) ensures that Canadian consumers and businesses prosper in a competitive and innovative marketplace. Led by the Commissioner of Competition (the Commissioner), the Bureau carries out the legislative mandate to promote and advocate for the benefits of competition in Canada.

For the Bureau, the experience of past crises has shown that economic crises not only provide some businesses with the opportunity to consolidate their market power, but may also be an opportunity for governments to adopt protectionist measures.

During the COVID-19 health crisis, while taking the market circumstances into account, the Bureau has published its guidelines on necessary competitor collaboration to ensure that essential products and services are available during the pandemic.

In the context of the economic downturn and recovery following the health crisis, the Bureau sees its role as two-fold. First, its role is to protect consumers, companies and public spending against anti-competitive conduct by applying the Act. Second, its role is to help policy makers consider competition during and after the pandemic.

The attached submission presents some of the Bureau's initiatives promoting competition to help policy makers during the economic downturn, and in anticipation of the recovery of the Canadian economy.

First, there is the Step-by-Step Guide based on the Bureau's experience and international best practices provided by the Organization for Economic Co-operation and Development (OECD) and the International Competition Network (ICN). This guide helps policy makers to identify harm to competition and take positive steps to mitigate it. In the guide, the Bureau answers the following questions:

- Why is it so important to maintain competition?
- How can policy goals be reached while keeping interference with competition to a minimum?
- When will policies have the greatest impact on competition and what mitigation strategies are available?

Second, the Commissioner or Bureau provides focused advice to policy makers on issues that are likely to have an effect on the recovery of the Canadian economy.

Costa Rica

The legal investigations and procedures associated with the analysis of the different types of possible anti-competitive conducts established in the national legislation, both in the cases assessed by the Commission for the Promotion of Competition (COPROCOM) and by the Telecommunications Superintendency (SUTEL), has been fostered as a result of the issuance of Law 9736 (Costa Rica Competition Authorities Empowerment Law), by establishing a special administrative procedure for competition cases. Having a legal framework that is unified at the levels of laws, bylaws, and guides for both competition authorities, will foster consistency and predictability in the procedures followed by both institutions, towards issuing jurisprudence that is in line with the Costa Rican legal standards. This will provide certainty in the procedures to the economic agents that are bounded to the domestic jurisdiction, promoting and benefiting the trust and legal certainty derived from the work of the competition authorities and therefore, furthering competitiveness and commercial dynamism.

Within the context of implementing the reforms set forth in Law 9736, Costa Rica declared a national state of emergency in March 2020 due to the COVID-19 pandemic. Under this scenario in the months of June and July, both COPROCOM and SUTEL, published guidelines related to applying the domestic competition legislation and relevant operating considerations, leading to effective compliance with said standards by both authorities, with the intended purpose of providing to the economic agents, within their respective jurisdictions, transparency and predictability in the procedures related to advocacy and enforcement that involve and will involve the aforementioned institutions, during the period of time that the economic shock in question is in effect.

The actions taken by the competition authorities in the recovery period must revolve primarily around advocacy and competition promotion actions. The Costa Rican Competition Authorities continue to be committed by legal mandate, to due compliance with the advocacy actions that the Law has granted them. They include market studies that were begun prior to the pandemic. Even so, clearly the situation caused by COVID-19 requires additional promotion actions. As for COPROCOM, it has remained particularly active during the health crisis caused by COVID-19 in issuing press releases relative to high-demand markets during the crisis. For its part, the SUTEL efforts have revolved around holding meetings with telecommunications operators to answer questions about how to apply the competition standards during the health crisis and to clarify how the authority will act in that area in the future.

Finally, the Costa Rican pre-merger control scheme facilitates both in times of crisis and in regular times, expeditious integration between economic operating agents or holders of commercial assets within the Costa Rican jurisdiction. Thus, the procedure for analyzing mergers that will be used by both SUTEL and COPROCOM, will evaluate the possible effects on the market derived from the announced transaction, while offering the operational economic agents under the Costa Rican jurisdiction, an expeditious pre-merger control scheme based on an analytically sound competition law, which favors economic dynamism.

Egypt

Past crises show that efficient competition law and policy is one of the most important tools that governments have, to build more resilient, inclusive, and sustainable economies. This is due to its paramount importance in ensuring the well-functioning of markets and the speedy recovery of the economy from a crisis. During the COVID-19 pandemic, the Egyptian Competition Authority (hereinafter “ECA”) has fully exercised its role as both enforcer and advocate of competition law and policy in Egypt in order to reduce the implications of the current crisis on the economy and foster its recovery.

The COVID-19 pandemic has drawn the attention of ECA to various changes on different levels, starting from institutional changes, to advocacy policies and enforcement measures, that should be adopted to alleviate the pandemic repercussions on Egypt’s business environment and to help ECA guarantee fair competition in the market.

ECA has allocated some resources in order to assess the impact of its competition policy enforcement on the macroeconomic indicators, and the mitigation of the repercussion of future crises. In order to assess how the adoption of effective competition law and policy may foster economic growth, ensure the well-functioning of markets and the speedy recovery of the economy from a crisis, ECA created a new department *Public Policy and Private Sector Enabling Department*. The latter’s objective is to quantify the impact of the enforcement of competition policy on macroeconomic variables and consumer well-being, by performing impact assessment studies and ex-post evaluations. The department vision is to prove the prominence of competition policy as an effective tool, especially for developing countries like Egypt, to foster economic development, attenuate crises’ economic repercussions, and help expedite the economic recovery, while reducing anti-competitive practices and promoting consumer welfare.

Within the framework of its advocacy powers attributed by Article 11 (5) of the Egyptian Competition Law (hereinafter “ECL”), during this crisis, ECA worked on building a continuous dialogue with public entities in Egypt, to address the implications of the COVID-19 pandemic. ECA undertook many advocacy measures in the medical sector, in order to avoid the exploitation of the Egyptian consumers’ needs by a small number of ethyl alcohol producers.

The COVID-19 pandemic has drawn ECA’s attention to the aviation sector. In light of the current crisis, ECA finds that the companies must receive support from the government, as different airlines are fighting to survive with the suspension of air traffic at most airports around the world for passenger transport.

In addition to its advocacy policy with public entities, ECA provided guidance to businesses on the procedures that were applied during the crisis, regarding the enforcement of ECL. Furthermore, ECA provided undertakings the opportunity to inquire about their compatibility with ECL, as well as regarding procedures that shall be followed in order to submit exemption requests, if applicable.

ECA is aware of the economic crisis that the country is facing and the drastic consequences the crisis may have on the Egyptian economy, which may affect businesses and consumers alike. However, this does not mean that ECA shall allow undertakings to engage in collusions or anti-competitive agreements or permit exploitation by an undertaking of its dominant position to eliminate competition. Thus, ECA adopted a strong enforcement policy regarding the prohibition of anti-competitive practices in order to ensure the availability and affordability of goods in these unprecedented times.

Given the role of competition law and policy in enhancing Egypt’s economic freedom and performance, considerable reform to ECL is required to enhance Egypt’s productive capacity and thus its international performance indicators. ECA is currently working on drafting fundamental amendments to ECL, the proposed reform will encompass many pillars, among which the introduction of the first *Ex-ante* Egyptian Merger Control Regime (hereinafter “EMCR”).

European Union

In times of crisis, the **EU competition rules** – first and foremost State aid control but also antitrust and merger control - have an **essential role to play**. The more competitive markets remain, the better investment will flow where it is truly needed.

When EU businesses were suffering from liquidity shortages due to lockdowns and other restrictive measures put in place by governments in order to tackle the pandemic and protect public health, the EU reacted swiftly. It adopted the **State aid** Temporary Framework, allowing Member States to support businesses hurt by the outbreak. The Temporary Framework has supported Member States in their efforts to deal with the effects of the crisis. The Commission has prolonged it recently to cater for the continued needs of businesses, while protecting the EU's Single Market. State aid rules will be also essential to support recovery efforts, notably in accompanying the implementation of the EU's Recovery and Resilience Facility, a key financing instrument that will help the EU emerge stronger and more resilient from the current crisis.

As regards **antitrust** enforcement, since the early days of the crisis, the Commission has sent two interlinked messages that guide its actions. The first message is that competition rules would not stand in the way of an efficient and justified response to specific and exceptional business needs. The second message is that vigorous enforcement remains the rule, particularly during the crisis, since it is essential for recovery. The Commission will not hesitate to intervene against companies that violate competition rules.

Despite the pandemic, in the six months after the outbreak, the number of new **merger** notifications was at levels comparable to previous years. As the EU regulatory and procedural framework for the assessment of mergers has not changed, the Commission continues to deal with merger cases in line with past practices. The Commission takes the foreseeable impact of the pandemic into account when assessing current market conditions and expected market developments. The crisis cannot serve as a pretext for approving mergers that would hurt consumers and hold back recovery.

Italy

The pandemic and the resulting economic crisis have hit the Italian economy profoundly, making more challenging the path to recovery given the low growth rates of the past twenty years.

The AGCM immediately reacted to some of the challenges linked to the COVID-19 emergency, through a mix of advocacy and enforcement strategies, including the use of consumer protection tools. Advocacy towards businesses assumed a prominent role in the emergency phase with the issuing of general guidance and informal guidance on specific cooperation projects linked to disruption in markets caused by the crisis. Moreover, in addressing calls for intervention to tackle price spikes especially in food and health-related services and products, such as hand sanitizers or face masks, the Authority used market monitoring tools, such as requests for information which were made public.

In parallel, the AGCM intervened on some of the government measures to support the sectors mostly affected by the health emergency, advising policymakers of the importance to keep a view on both short-term intervention and long-term structural effects of the measures being envisaged. In particular, the Authority's advocacy efforts focused on the obstacles for the development of the digital infrastructure, which has become even more essential after the pandemic.

For this reason, also on the enforcement side the Authority focused on connectivity, e-commerce and digital services, although the pandemic has not radically changed its priorities. Indeed, the main efforts of the AGCM are still focused on i) the fight against cartels, especially bid rigging in public procurement, ii) investigating restrictions with a direct impact on final consumers' purchasing power and iii) restrictions in the digital economy, that might not only harm consumers but also, in the medium run, negatively affect the economic recovery.

While State intervention is essential to the recovery process which cannot rely on market forces alone, the challenge for the Authority is to ensure that competition policy is coordinated and integrated with other government's public policies, by demonstrating how it can contribute to the achievement of other goals, including the new government's priority of a transition to green economy. In this context, the AGCM believes that competition law and particularly merger control should not be relaxed, but should privilege a forward-looking approach and a more dynamic assessment in order to fully appreciate the impact in the longer run.

Mexico

Summary (COFECE)

The COVID-19 health crisis has caused an economic slowdown which is also leading to an economic crisis around the world that ultimately affects markets and consumer welfare. Given this difficult economic scenario, competition agencies have a role to play in the process of economic recovery to guarantee that markets remain competitive and efficient. The Mexican Federal Economic Competition Commission (COFECE) has conducted several efforts to respond to the crisis by ensuring the continuity of its law enforcement operations to keep delivering results for the benefit of Mexican consumers, and by applying its advocacy tools to safeguard competitive neutrality in key markets. All of this, to contribute and ensure a sustainable recovery of the Mexican economy.

Summary (IFT)

This contribution references some of the actions carried out by the Federal Telecommunications Institute (IFT) as a response to the pandemic caused by the SARS-CoV2 virus (COVID-19).

In order to protect IFT's human capital, the Board of Commissioners issued several resolutions of labor suspension and implemented telework. In addition, to facilitate the continuation of telecommunications and broadcasting services, the IFT enabled 84% of the total of its procedures, through electronic means,

The procedure of general orientations on economic competition issues, provided for in the Regulatory Provisions of the Federal Economic Competition Law (LFCE), remained into force and could be requested by email.

Under IFT's coordination and supervision to avoid any anti-competitive practices that could harm markets and competition, fixed and mobile telecommunications service providers, offered special plans and support to users. Internet and fixed telephone service providers offered a temporary low-cost plan called "Contingency Support" which provided internet access, free browsing and unlimited data, receiving calls and dialing to emergency numbers of the sanitary emergency official line authorized by the Federal Government, free of charge. Likewise, mobile telecommunications providers launched "emergency plans" to support users who could not pay their services during the health emergency. These plans allowed prepaid users (84% of all mobile service subscribers) to access, only once, to a free package of voice calls and short messages service, during the pandemic.

In the broadcasting sector, the IFT's Board determined that the concessionaires providing broadcast television services, could access to multiprogramming or request the change of programmatic identity, and would be exempted from compliance and application of the requirements established in the General Guidelines for Access to Multiprogramming, as long as they included the school sessions of the Ministry of Public Education in its transmissions. These measures will subsist until the competent authorities in health and educational matters, determine by any official communication, the resumption of face-to-face school activities throughout Mexico.

Russian Federation

In 2020, the global economy was in a state of recession due to a shocking threat.

The reason for this was that many countries around the world, against the backdrop of the pandemic of the new coronavirus infection COVID-19, took preventive measures, which significantly affected the economy.

In order to build the economy of the future, it is necessary to create an institutional economic basis for change at the first stage of 2021 – 2022.

It must be emphasized that maintaining competition over the long term is essential for the functioning of markets, consumer welfare, innovation, employment and economic growth.

In turn, the implementation of the state policy for the development of competition is not a one-time event, but one of the key directions and factors of economic growth. At the same time, competition and measures for its development are precisely the resource that can make the country's economy more developed.

The FAS Russia, as a guarantor of compliance with antimonopoly legislation, protects not only the economic structure of markets that find themselves in a difficult situation during a pandemic, but also stimulates measures that allow less painful recovery of the economy.

The growth in the number of anticompetitive practices, cases of abuse of dominant position (price increases), as well as signs of cartels sets the antimonopoly authority tasks – on the one hand, to suppress anticompetitive manifestations, and on the other hand, to stimulate economic recovery with minimal losses, taking into account ensuring a balanced policy between promoting business, especially medium and small, and helping consumers and citizens.

As in previous economic crises, the efforts of competition authorities to promote and protect competition will play a critical role in managing the impact of the crisis and creating the best conditions for economic recovery.

Spain

In the face of the pandemic, policymakers, including Spain's, have implemented major stimulus plans and reforms to minimize its impact. These measures have prevented a deeper recession, but challenges to competition remain that must be addressed to avoid a possible decline in competition levels which may hamper recovery and prosperity in the long run. Indeed, one of the most efficient policy options to accelerate a strong, sustainable and inclusive recovery is to enhance competition and good regulation. Therefore, competition authorities must act to defend and promote competitive markets and good regulation.

The Spanish National Commission on Markets and Competition (CNMC) has worked intensely during the crisis. During the first phase of the pandemic, CNMC reviewed its annual plan, adapting it to the current circumstances. Also, CNMC provided guidance to firms to enhance legal certainty and helped policymakers to design some of the various emergency measures adopted. Moreover, CNMC introduced a Covid-19 mailbox which has received more than 700 complaints and led to several market investigations.

CNMC's role during the coming years will be increasingly important. CNMC advice to policymakers may serve to encourage and improve pro-competitive reforms, prevent measures that distort competition and help preserve competitive neutrality. CNMC is working on guidelines to policymakers to accelerate the economic recovery, with a concrete focus on state aid, public procurement and good regulation, and is preparing market studies on online advertising, pharma market, transport, ports or employment, which will consider the new challenges posed by the pandemic. This way, CNMC can help stimulate a robust, sustainable and inclusive economic recovery.

Portugal

We are living in unprecedented times, which have raised countless challenges to societies and to the respective competition authorities all around the globe. The current Covid-19 crisis presents unique features due to its speed, severity, cross-sectoral and worldwide nature. As such, it is still too early to take any conclusions: the main challenges are yet to come.

Since the early stages of this crisis, the Portuguese Competition Authority (Autoridade da Concorrência, AdC) has continued to assume its enforcer role as vigorously as possible and avoided the narrative that competition law could be suspended during the pandemic: on the contrary, the AdC signalled to the market that competition rules remained fully in force.

These interventions are crucial for the society and the national economy, ultimately benefitting consumers. A vigorous and effective competition policy brings significant benefits such as more productivity and competitiveness, products and services with better quality, innovation, variety and lower prices, that is, greater consumer welfare. Conversely, an ineffective competition policy harms consumers, the competitiveness of businesses and the economy as a whole.

Notwithstanding, the AdC acknowledged that the unique circumstances of the Covid-19 crisis required an adjustment of its internal organization and procedures and a prioritization of its intervention on competition enforcement and advocacy in certain sectors particularly relevant during the pandemic.

However, the AdC has also unequivocally shown that it would not tolerate opportunistic behaviour by companies that, under the pretext of the Covid-19 crisis, might seek to exploit the current situation by abusing their market power or colluding to the detriment of consumers. In this regard, the AdC has ensured business continuity, opening investigations, conducting unannounced inspections and adopting decisions.

In addition, the AdC will pursue its advocacy action, issuing recommendations necessary to promote competition and protect consumer welfare.

Looking forward, it will be essential to recover the economy. The AdC will continue to play its role in this regard, remaining vigilant and maintaining a vigorous advocacy and enforcement activity, thus ensuring that competition policy becomes one of the pillars of the economic recovery.

*Ukraine**

This contribution will focus on the first and second stages of the crisis (emergency and re-alignment) caused by Covid-19. The last part of this contribution will reflect on the possible role of the competition authority in the recovery phase.

Risks of abuse of monopoly position as well as other violations of competition law began to grow rapidly from the first days of quarantine in Ukraine. The threat of the disease spreading in Ukraine has caused concern and panic among the consumers, which led to mass purchases of basic necessities.

One of the main measures taken by the AMCU during the Covid-19 crisis was advocacy in the form of recommendations for economic entities. The AMCU and its regional offices on March 16, 2020 began short-term daily monitoring of food prices in commercial networks and took a number of recommendations to prevent violations of competition law. Despite the positive outcome of advocacy efforts, some businesses still violated competition law during the crisis. The AMCU initiated proceedings against food market players in Kyiv and Kyiv region for concerted practices.

The AMCU also played a part by providing the Cabinet of Ministers with the draft of new criteria for state aid to economic entities most affected by the COVID-19, taking into consideration the EU practice.

Finally, during the recovery phase, the AMCU is developing a compliance risks map based on information on the behaviour of economic entities during the crisis and the effectiveness of measures taken to prevent and punish violations of competition law.

United States

The U.S. antitrust agencies have undertaken a number of initiatives to help spur recovery from the COVID-19 crisis, including stepped-up criminal enforcement, policy guidance to health and emergency-related government agencies, and expedited review of private sector cooperative efforts.

The Agencies remain vigilant in combatting anticompetitive behavior by firms seeking to take advantage of the COVID-19 crisis. For example, in March 2020, the Attorney General announced the creation of the COVID-19 Hoarding and Price Gouging Task Force, which is charged with developing effective enforcement measures and best practices, and coordinating nationwide investigation and prosecution of illicit activities. The DOJ is also stepping up efforts to combat crisis-related disruption through the newly-created Procurement Collusion Strike Force (PCSF), an interagency partnership dedicated to protecting taxpayer-funded projects from antitrust violations and related crimes at the federal, state, and local levels. In addition, DOJ and FTC are working to protect competition in labor markets, which have been subject to significant dislocation due to the economic impact of COVID-19.

The FTC also has worked aggressively to address consumer protection issues arising from the COVID-19 pandemic, including fraud related to the government's economic impact payments, unsubstantiated health claims, illegal robocalls, privacy and data security concerns, online shopping fraud, and a variety of other scams related to the economic fallout from the COVID-19 pandemic. Acting on information from consumer complaints and its own monitoring of the marketplace, the FTC has pursued a rigorous warning letter program and filed law enforcement actions for injunctive and other relief in federal courts.

The FTC and DOJ also have shared their competition expertise with other international and federal agencies in order to facilitate COVID-19 response and recovery while preserving competitive markets. Among other efforts, the Agencies have been working closely with the Federal Emergency Management Agency (FEMA) to develop a Voluntary Agreement governing cooperation among industry participants seeking to respond to the pandemic.

While procedural aspects of the Agencies' work have changed as a result of COVID-19, the Agencies' view of key U.S. antitrust standards has not changed. The Agencies have reiterated that the antitrust laws are flexible enough to account for changing market conditions, even during uncertain times. In particular, the Agencies continue to take the view that the failing firm defense is narrow in scope, and should be invoked selectively.

The Agencies are continuing to advocate for changes to regulations that may impede competition, which may cause even greater harm in the context of the COVID-19 crisis. For example, the Agencies have submitted multiple letters to state legislatures in recent years expressing their concerns over "certificate of need" laws and other restrictions on the availability of health care resources. The Agencies plan to continue our advocacy to remove regulatory impediments to competition in the health care sector.

Finally, the Agencies are working together to bolster the recovery by providing guidance relating to recovery-related collaborations on an expedited basis. For example, in a joint statement in April, the Agencies emphasized the potential importance of pro-competitive collaborations between private firms to bring essential goods and services to communities in need. The Agencies also announced an expedited business review letter program, under which all COVID-19-related requests will receive responses within seven calendar days of

the Agencies receiving all necessary information. The DOJ has issued four COVID-19 business review letters through this process.