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COMP/M. 4575 – RICOH / IBM

SECTION 1.2

Description of the concentration

On February 28, 2007, the Commission received a notification of a proposed concentration pursuant to Article 4 of the EC Merger Regulation, by which Ricoh Company Ltd. ("Ricoh") will acquire sole control over the printer business of IBM.

- Ricoh: manufacturing and distribution of printers and related services;

- IBM: distribution of printing solutions and related services.

The parties' activities overlap only in the wholesale distribution of printers in several EEA countries, Ricoh being also active in the upstream production markets.

In view of the modest market shares of the Parties in every possible reportable market, Ricoh respectfully submits that the transaction does not raise competition concerns and is eligible for the simplified procedure.