



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Director
Bureau of Competition

FEB 17 2009

Richard Liebeskind, Esq.
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW
Washington, DC 20037-1122

RE: Carlisle Companies Inc./ACH Foam Technologies
FTC File No. 071-0158

Dear Mr. Liebeskind:

The Federal Trade Commission's Bureau of Competition conducted a nonpublic investigation to determine whether the proposed acquisition of ACH Foam Technologies by Carlisle Companies Inc. violates Section 7 of the Clayton Act or Section 5 of the Federal Trade Commission Act.

By letter dated January 4, 2008, counsel for Carlisle Companies Inc. notified staff that the parties had abandoned the proposed transaction. Based upon this representation, it now appears that no further action is warranted by the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. P. Wales, Jr.", written over a horizontal line.

David P. Wales, Jr.
Acting Director