INDEX

abuse of dominance, 79–91. See also
economic analysis
competitive effects, 90–1
consequences, 62
dominant position, 81–5
legitimate reasons, 88–90
market definition, 80–1
types of conduct, 85–8
excessive pricing, 87–8
imposing unreasonable conditions, 87
tying and bundling, 86–7
abuse of market power. See abuse of dominance
administrative enforcement. See abuse of dominance; administrative enforcement structure;
administrative monopoly; enforcement decisions; merger control; Ministry of Commerce; monopoly agreements; National Development and Reform Commission; State Administration for Industry and Commerce
administrative enforcement structure, 138–47
AML drafting process, 214–19
criticisms of, 12–14, 308–10
enforcement power, struggles for, 247–59, 298–300
institutional design issues
bureaucratic rank, 185–7
capacity constraints, 175–7, 303–4
cooperation and coordination, 179–82
knowledge constraints, 177–8, 303–4
multiple roles and responsibilities, 182–5
public enforcement, 244–7
administrative monopoly, 91–6
AML drafting process, 224–9
economic reform, 158–9
fair competition review system, relationship to, 293–4
industry monopoly, 110–11
regional monopoly, 158–9
administrative power, abuse of. See administrative monopoly
administrative rank. See bureaucratic rank
Alpha V/Savio, 40–1, 45–6
AMC. See Anti-monopoly Commission
AML drafting process, 202–13
administrative monopoly, 224–9
competition law experts in, 209–13
coordination in, 241–2
dynamics of, 241–2
enforcement power, struggles for, 214–24, 241
administrative enforcement structure, 214–19
regulated industries, 219–24
foreign investment, 238–40
industrial policy, 232–5
industry associations, 235–8
international norms, 211–13
legislative history, 202–5
national security, 238–40
policy influences on, 207–9
political commitment, 205–7

376
regulated industries, 219–24
enforcement power, 221–3
exemption, 220–1
sector-specific laws, relationship
with AML, 223–4
role of the state, 229–32
state-owned enterprises,
230–2
timeline of, 332–4
anti-competitive agreements. See
monopoly agreements
Anti-monopoly Commission (AMC),
147–9
AML drafting process, 218–19
composition, 147–8
as coordination mechanism,
301
expert advisory group, 148
functions, 148–9
Anti-Monopoly Law (AML)
abuse of dominance, 79–91
administrative enforcement
structure, 138–47
criticisms of, 12–14, 308–10
administrative monopoly, 91–6
AML drafting process, 202–13
AUCL, overlap with, 122–3
criticisms, 4–16, 305–11
administrative enforcement
structure, 12–14, 308–10
due process, lack of, 14–16, 310–11
foreign companies, discrimination
against, 9–12, 307–8
non-competition factors, 6–7,
305–6
state-owned enterprises,
protection of, 8–9, 306
existing analytical approach, 20–2
international norms, 4–5, 211–13
knowledge of, 107–8, 115–16,
303–4
legal and economic analysis under,
28–59, 64–96
legal transplant, 16–18
merger control, 28–59
monopoly agreements, 64–79
political economy analytical
framework, 22–4
Price Law, overlap with, 122–3,
288–9
private enforcement, 161
societal context, 20–2
Anti-Unfair Competition Law (AUCL),
121–2, 144, 146, 182
AML, overlap with, 122–3,
184–5, 257–9
AUCL. See Anti-Unfair Competition
Law
auto industry, public enforcement in,
292, 302–3
Baxter/Gambro, 40–1, 45–6,
52–3
behavioural conditions, 47–56. See also
merger conditions; structural
conditions
exclusive dealing, 54–5
exercise of rights, 55–6
existing agreement, 52–3
long-term hold separate, 50–2
market expansion, 53–4
regulatory nature, 286–8
supply or access commitment,
48–50
tyling and bundling conduct, 54–5
bureaucratic rank, 105–6, 156,
185–7, 279–80, 286, 304
capacity constraints, competition
authorities, 175–7, 303–4
central government
economic reform, 157–8
local government
enforcement responsibility,
division of, 181–2, 247
relationship with, 196
state-owned enterprises, 103–5.
See also central SOEs
central SOEs, 103–5. See also state-
owned enterprises
public enforcement, 278–80,
282–3, 306
Chifeng TobaccoTying, 86–7
China Telecom/China Unicom Abuse of
Dominance, 83, 254–6,
278–81, 300, 302, 306
INDEX

Chinese People’s Political Consultative Conference (CPPCC), 114
Coca-Cola/Huiyuan, 10–11, 59, 266
Communist Party of China (CPC), 187–91
bureaucratic rank, 185–7
five-year plans, 192–4
leading small groups, 132–3, 190–1
nomenklatura system, 106–7, 188–9
policy, 191–2, 261–2
relationships with government, 166–7, 188–91
private companies, 114–16
state-owned enterprises, 106–7, 132–3
supervision within government, 189–90
competition analysis, under AML. See abuse of dominance; administrative monopoly; economic analysis; merger control; monopoly agreements
competition authorities, 138–47. See also administrative enforcement structure; Ministry of Commerce; National Development and Reform Commission; State Administration for Industry and Commerce
capacity constraints, 175–7, 303–4
competition law knowledge, 177–8, 303–4
cooperation and coordination, 179–82
enforcement power, struggles for, 247–59, 298–300
multiple roles and responsibilities, 182–5
competition law. See also Anti-Monopoly Law
context, 16–20
legal transplant, 16–18
competition law experts, 167–74
AMC expert advisory group, 148
AML drafting process, 209–13
Chinese drafting process, 209–11
economists, 172–4, 211
foreign experts, 169–72, 211–13
competition law knowledge, 303–4
AMC expert advisory group, 148
competition authorities, 143–4, 146–7, 177–8
competition law experts, 167–74
foreign companies, 116
judges, 178–9
private companies, 115–16
state-owned enterprises, 107–8
concentration of business operators. See merger control constraints. See capacity constraints; knowledge constraints
goal of competition law, 16–22
goal of competition policy and other policies, 259–77
fair competition review system, 293–4
foreign investment policy, 273–5
innovation and innovation-driven development, 260–8
people’s well-being and livelihood, 275–7
regulatory policy, 268–73
courts, 161–7
Communist Party of China, relationship with, 166–7
competition law knowledge, 178–9
decisions, 163–4
hierarchy, 161–2
independence, 164–5
CPC. See Communist Party of China
CPPCC. See Chinese People’s Political Consultative Conference
<table>
<thead>
<tr>
<th>Demand-side stakeholders and dynamics</th>
<th>Market concentration, 35–6</th>
</tr>
</thead>
<tbody>
<tr>
<td>foreign companies, 113–17</td>
<td>market control, 83–4</td>
</tr>
<tr>
<td>foreign investment, 124–8</td>
<td>market entry, 36–7, 84–5</td>
</tr>
<tr>
<td>governance gap, 120–3</td>
<td>market share, 35, 82–3</td>
</tr>
<tr>
<td>pre-existing competition laws, 121–2</td>
<td>dominant market position,</td>
</tr>
<tr>
<td>industry associations, 118–20</td>
<td>81–5</td>
</tr>
<tr>
<td>industry regulators, 109–13</td>
<td>market definition, 32–4,</td>
</tr>
<tr>
<td>industry monopoly, 110–11</td>
<td>80–1</td>
</tr>
<tr>
<td>sector-specific laws, 112–13</td>
<td>theories of harm, 37–42,</td>
</tr>
<tr>
<td>state-owned enterprises,</td>
<td>50</td>
</tr>
<tr>
<td>relationship with, 111–12</td>
<td>coordinated effects, 39–41</td>
</tr>
<tr>
<td>key stakeholders, 102–20</td>
<td>foreclosure effects, 41–2</td>
</tr>
<tr>
<td>policy environment, 124–34</td>
<td>unilateral effects, 37–9</td>
</tr>
<tr>
<td>foreign investment, 124–8</td>
<td>economic reform, 120–1, 157–8</td>
</tr>
<tr>
<td>industrial policy, 133–4</td>
<td>economic theories of harm,</td>
</tr>
<tr>
<td>role of the state, 128–9, 133</td>
<td>37–42, 50</td>
</tr>
<tr>
<td>state-owned enterprises, 128–34</td>
<td>coordinated effects, 39–41</td>
</tr>
<tr>
<td>private companies, 113–16</td>
<td>foreclosure effects, 41–2</td>
</tr>
<tr>
<td>state-owned enterprises,</td>
<td>unilateral effects, 37–9</td>
</tr>
<tr>
<td>102–9</td>
<td>enforcement authorities,</td>
</tr>
<tr>
<td>bureaucratic rank, 105–6</td>
<td>for AML.</td>
</tr>
<tr>
<td>central SOEs, 103–5</td>
<td>See administrative</td>
</tr>
<tr>
<td>Communist Party of China,</td>
<td>enforcement structure;</td>
</tr>
<tr>
<td>relationship with, 106–7</td>
<td>Anti-monopoly Commission;</td>
</tr>
<tr>
<td>competition law knowledge,</td>
<td>competition authorities;</td>
</tr>
<tr>
<td>107–8</td>
<td>Ministry of Commerce;</td>
</tr>
<tr>
<td>governance, 104</td>
<td>National Development and</td>
</tr>
<tr>
<td>industry regulators, relationship</td>
<td>Reform Commission; State</td>
</tr>
<tr>
<td>with, 111–12</td>
<td>Administration for Industry</td>
</tr>
<tr>
<td>local SOEs, 104–5</td>
<td>and Commerce</td>
</tr>
<tr>
<td>policy environment, 128–34</td>
<td>enforcement decisions</td>
</tr>
<tr>
<td>role of, 130–1</td>
<td>Alpha V/Savio, 40–1, 45–6</td>
</tr>
<tr>
<td>State-owned Assets Supervision and</td>
<td>auto industry, 292, 302–3</td>
</tr>
<tr>
<td>Administration Commission,</td>
<td>Baxter/Gambro, 40–1, 45–6,</td>
</tr>
<tr>
<td>104–7</td>
<td>52–3</td>
</tr>
<tr>
<td>discrimination, against foreign</td>
<td>Chifeng TobaccoTying, 86–7</td>
</tr>
<tr>
<td>companies, 9–12, 307–8</td>
<td>China Telecom/China Unicom Abuse</td>
</tr>
<tr>
<td>dominant market position. See abuse</td>
<td>of Dominance, 83, 254–6,</td>
</tr>
<tr>
<td>of dominance; economic analysis</td>
<td>278–81, 300, 302, 306</td>
</tr>
<tr>
<td>dual accountability system. See tiao</td>
<td>Coca-Cola/Huiyuan, 10–11, 59, 266</td>
</tr>
<tr>
<td>kuai system</td>
<td>Fushun TobaccoTying, 86–7</td>
</tr>
<tr>
<td>due process, under AML, 14–16,</td>
<td>Google/Motorola Mobility, 56–7,</td>
</tr>
<tr>
<td>251–3, 310–11</td>
<td>263–4</td>
</tr>
<tr>
<td>economic analysis</td>
<td>Infant Formula RPM, 78, 291–2</td>
</tr>
<tr>
<td>competitive effects, 34–42, 71–2, 90–1</td>
<td>InterDigital Abuse of Dominance,</td>
</tr>
<tr>
<td>94</td>
<td>264–5</td>
</tr>
<tr>
<td>economic analysis</td>
<td>Liaoning Cement Clinker Cartel,</td>
</tr>
<tr>
<td></td>
<td>73–4</td>
</tr>
<tr>
<td></td>
<td>Merck/AZ Electronics, 42</td>
</tr>
<tr>
<td></td>
<td>Microsoft/Nokia, 38–9, 55–6,</td>
</tr>
<tr>
<td></td>
<td>263–4</td>
</tr>
</tbody>
</table>
enforcement decisions (cont.)
by Ministry of Commerce, 315–19
compared to other competition authorities, 63–4
overview, 31–2
by National Development and Reform Commission, 319–27
compared to Ministry of Commerce, 63–4
overview, 63–4
Nokia/Alcatel-Lucent, 55–6, 263–4
Novartis/Alcon, 40, 52–3
P3 Shipping Alliance, 59
Panasonic/Sanyo, 45–6
pharmaceutical industry, 271–3
Qualcomm Abuse of Dominance, 82–4, 86–8, 91, 264–5
salt industry, 271
Seagate/Samsung, 39–40, 44–57
Shanghai Gold and Platinum Jewellery Cartel, 281–2
by State Administration for Industry and Commerce, 328–32
compared to Ministry of Commerce, 63–4
overview, 63–4
TravelSky Cartel, 256–7, 279–80, 300, 306
Wal-Mart/Newheight, 269–70, 274–5, 300
Western Digital/Hitachi, 39–40, 44–57

fair, reasonable, and non-discriminatory (FRAND), 49, 264
fair competition review system, 293–4
administrative monopoly, relationship to, 294
review criteria, 293
FCS. See fiscal contracting system
Financial and Economic Affairs (FEA) Committee, 151–2
fiscal contracting system (FCS), 157–8
five-year plans, 130, 192–4
foreign companies, 113–17. See also foreign investment policy
AML drafting process, 239–40
competition law knowledge, 116
discrimination against, 9–12, 307–8
foreign investment, 124–8
national security, 238–40
public enforcement, 273–5
foreign competition law experts, 169–72, 211–13
foreign investment policy, 124–8, 273–4
AML drafting process, 238–40
public enforcement, consideration in, 273–5
FRAND. See fair, reasonable, and non-discriminatory
Fushun Tobacco Tying, 86–7
Google/Motorola Mobility, 56–7, 263–4
government, 156–60. See also central government; local government
central-local relations, 156–60, 196
Huang Yong, 167–9, 204, 210
indigenous innovation, 262
industrial policy
AML drafting process, 232–5
innovation-driven development, 260–8
industry associations, 118–20
AML drafting process, 235–8
quasi-governmental nature, 118–19
industry regulators, 109–13
AML drafting process, 219–24
industry monopoly, 110–11
Ministry for Industry and Information Technology, 110
public enforcement, involvement in, 247–59
sector-specific laws, 112–13, 223–4
state-owned enterprises, relationship with, 111–12
Infant Formula RPM, 78, 291–2
innovation-driven development, 260–8
brands, 266–8
indigenous innovation, 262
intellectual property rights, 262–6
intellectual property rights (IPRs), 262–6
InterDigital Abuse of Dominance, 264–5
international competition law norms, 211–13
IPRs. See intellectual property rights
judges. See courts
jurisdiction
AML drafting process, 214–24
administrative enforcement structure, 214–19
regulated industries, 219–24
defined, 214
public enforcement, 244–59
competition authorities, division of responsibility, 244–7
other government authorities, involvement in, 247–59

knowledge constraints, 177–9, 303–4

LAO. See Legislative Affairs Office
lawyers. See legal practitioners
legal practitioners, 174–5
legal transplant, 16–18
Legislative Affairs Office (LAO), 155
AML drafting process, 202–5
Liaoning Cement Clinker Cartel, 73–4
local government, 156–60
central government
AML enforcement responsibility, division of, 181–2, 247
relationship with, 196
economic reform, 157–8
public enforcement, 247
regional monopoly, 158–9

state-owned enterprises, 104–5.
See also local SOEs
local SOEs, 104–5. See also state-owned enterprises
public enforcement, 280–2
lower-level government. See local government

macroeconomic regulation and control, 191–4
AML drafting process, 229–30
public enforcement, 286–92
merger conditions, regulatory nature of, 286–8
price supervision and regulation, 288–92
market definition. See economic analysis
Merck/AZ Electronics, 42
merger conditions, 42–58
behavioural conditions, 47–56
consultation and consensus, impact of, 250
regulatory nature, 286–8
review, 56–8
revocation, 56–8
structural conditions, 44–7
variation, 56–8
merger control, 28–59. See also economic analysis
analysis under AML, 28–59
competitive effects, 34–42
market definition, 32–4
theories of harm, 37–42, 50
conditional approval. See merger conditions
other government policies, 263–4, 266–70, 273–5
prohibition, 58–9
review process, 247–53
consultation and consensus, 248–50
delays, 251–3
due process, 14–15
simple cases, 29–30, 252–3
merger remedies. See merger conditions
Microsoft/Nokia, 38–9, 55–6, 263–4
INDEX

MIIT. See Ministry for Industry and Information Technology

Ministry for Industry and Information Technology (MIIT), 110

*China Telecom/China Unicom Abuse of Dominance*, 255–6

merger review, consultation during, 248–9

*Tencent/Qihoo* 360, 146, 257–9

*Wal-Mart/Newheight*, 269–70, 275

Ministry of Commerce (MOFCOM), 141–4

AML administrative enforcement structure, 142–3

AML drafting process, 203–5, 207–8, 214–21

capacity constraints, 175–7, 303–4

competition law knowledge, 143–4

enforcement activity, 28–59. See also behavioural conditions; merger conditions; merger control; structural conditions consultation with government authorities, 247–53

merger conditions, regulatory nature, 286–8

other government policies, 263–4, 266–70, 273–5

state-owned enterprises, 282–6

enforcement decisions, 315–19 compared to other competition authorities, 63–4

overview, 31–2

knowledge constraints, 177–8, 303–4

multiple roles and responsibilities, 181–2

State Economic and Trade Commission, 203–5

monopoly agreements, 64–79. See also economic analysis consequences, 62
determination of, 65–70

exemption, 72–5

leniency policy, 76–9

prohibition, 70–2
types of conduct, 68–70

market sharing, 69

price fixing, 68–9

resale price maintenance, 70

National Development and Reform Commission (NDRC), 139–41

AML administrative enforcement structure, 142–3

AML drafting process, 216–19

capacity constraints, 175–6

cooperation and coordination between central and local authorities, 181–2, 247

with State Administration for Industry and Commerce, 179–81, 243–6, 298–9

enforcement activity. See also abuse of dominance; administrative monopoly; monopoly agreements merger control, consultation in, 247–9

non-merger conduct, 59–96

other government authorities, involvement in, 253–7

other government policies, 263–4, 269–73, 275–7, 294

price supervision and regulation, 288–92

state-owned enterprises, 277–81

enforcement decisions, 319–27 compared to Ministry of Commerce, 63–4

overview, 60–1

knowledge constraints, 177–8

multiple roles and responsibilities, 182–3

price supervision and regulation, 182–3, 288–92

National People’s Congress (NPC), 149–54. See also Standing Committee of the National People’s Congress
Financial and Economic Affairs (FEA) Committee, 151–2
Law Committee, 151–3
Legislative Affairs Commission, 152–4
national security, 238–40
NDRC. See National Development and Reform Commission
Nokia/Alcatel-Lucent, 55–6, 263–4
nomenklatura system, 106–7, 188–9
non-competition factors, consideration in AML, 6–7, 305–6
non-merger conduct, 59–96. See also abuse of dominance; administrative monopoly; monopoly agreements
analysis under AML, 59–96
consequences, 62
enforcement responsibility, 60, 244–7
investigation process, 253–9
due process, 15
other government authorities, involvement in, 253–9, 263–4, 269–73
state-owned enterprises, 277–81
Novartis/Alcon, 40, 52–3
NPC. See National People’s Congress
P3 Shipping Alliance, 59
Panasonic/Sanyo, 45–6
people’s well-being and livelihood, 275–7
pharmaceutical industry, public enforcement of, 79–80, 271–3
political economy analytical framework, for AML, 22–4, 297–8. See also demand-side stakeholders and dynamics; supply-side stakeholders and dynamics
pre-existing competition law regime, 120–3. See also Anti-Unfair Competition Law; Price Law
AML, overlap with, 122–3, 182–5, 257–9
Price Law, 121–2, 140, 183
AML, overlap with, 122–3, 182–4, 288–9
price supervision and regulation, 288–92
private companies, Chinese, 113–17
Communist Party of China, relationship with, 114–16
competition law knowledge, 115–16
public enforcement, 60–1, 81
provincial government, 156–60. See also local government
central government
AML enforcement responsibility, division of, 181–2, 247
relationship with, 196
economic reform, 157–8
public enforcement, 247
regional monopoly, 158–9
Qualcomm Abuse of Dominance, 82–4, 86–8, 91, 264–5
regional monopoly, 158–9. See also administrative monopoly
AML drafting process, 224–9
regulated industries. See also industry regulators
AML drafting process, 219–24
public enforcement, 268–73
restrictive conditions. See behavioural conditions; merger conditions
SAIC. See State Administration for Industry and Commerce
salt industry, public enforcement in, 271
SASAC. See State-owned Assets Supervision and Administration Commission
SCNPC. See Standing Committee of the National People’s Congress
Seagate/Samsung, 39–40, 44–57
SETC. See State Economic and Trade Commission
INDEX

Shanghai Gold and Platinum Jewellery Cartel, 281–2
Sheng Jiemin, 125, 167–8, 204, 210, 217
Shi Jianzhong, 167–9, 204, 210
simple case mergers, 29–30, 252–3
socialist market economy
Communist Party of China, 187–91
five-year plans in, 130, 192–4
industrial policy, 133–4, 208–9, 232–5, 249, 260–8
macroeconomic regulation and control, 191–4, 286–92
public ownership, 128–9
relationship between state and market, 191–2, 277–94, 301–3
role of the market, 191–2
role of the state, 128–9, 133, 191–4, 229–32, 286–92
SOEs. See state-owned enterprises
Standing Committee of the National People’s Congress (SCNPC), 149–54. See also National People’s Congress
AML drafting process, 203–5, 208–9, 221–3, 227–40
composition of, 150–1
State Administration for Industry and Commerce (SAIC), 144–7
AML administrative enforcement structure, 144–5
AML drafting process, 203–5, 207–8, 214–21
AUCL, 121–2, 144, 146, 182
AML, overlap with, 122–3, 184–5, 257–9
capacity constraints, 175–6
capacity and coordination between central and local authorities, 179–82, 244–7, 298–9
with NDRC, 179–81, 243–6, 298–9
enforcement activity, 59–96. See also abuse of dominance; administrative monopoly; monopoly agreements
non-merger conduct, 59–96
other government authorities, involvement in, 253–4, 257–9
other government policies, 266, 271–3, 275–7
state-owned enterprises, 280–1
enforcement decisions, 328–32
compared to Ministry of Commerce, 63–4
overview, 60–1, 63–4
knowledge constraints, 177–8
multiple roles and responsibilities, 182–3
State Council, 154–5
AML drafting process, 202–5, 208, 217–24, 226–9, 233
Legislative Affairs Office, 155
State Economic and Trade Commission (SETC), 203–5
State-owned Assets Supervision and Administration Commission (SASAC), 104–7, 133–4
state-owned enterprises (SOEs), 102–9. See also central SOEs; local SOEs; State-owned Assets Supervision and Administration Commission
bureaucratic rank, 105–6
central SOEs, 103–5, 278–80, 282–3, 306
Communist Party of China, relationship with, 106–7
competition law knowledge, 107–8
governance, 104
industry regulators, relationship with, 111–12
local SOEs, 104–5, 280–2
policy environment, 128–34
protection of, 8–9, 306
public enforcement, 278–86
reform of, 131–3
role of, 130–1
State-owned Assets Supervision and Administration Commission, 104–7
INDEX

structural conditions, 44–7. See also
behavioural conditions; merger
conditions
crown jewel provisions, 47
divestiture, 45–6
fix-it first provisions, 45–6
supply-side stakeholders and dynamics
Anti-monopoly Commission,
147–9
Chinese competition authorities,
138–47
Ministry of Commerce, 141–4
National Development and
Reform Commission,
139–41
State Administration for Industry
and Commerce, 144–7
Communist Party of China,
187–91
competition law experts, 167–74
AMC expert advisory group,
148
Chinese academics, 167–9
economists, 172–4
foreign experts, 169–72
courts, 161–7
Communist Party of China, relationship with, 166–7
hierarchy, 161–2
independence, 164–5
industry regulators, 113
institutional design issues, 175–87
bureaucratic rank, 185–7
capacity constraints, 175–7
cooperation and coordination,
179–82
knowledge constraints, 177–9
multiple roles and responsibilities,
182–5
key stakeholders, 137–75
legal practitioners, 174–5
local government, 156–60, 196
policy environment, 187–96
central-local relations, 196
macroeconomic regulation,
191–4
provincial government, 156–60, 196
Standing Committee of the National
People’s Congress, 149–54
State Council, 154–5
Supreme People’s Court. See courts
technical assistance, 171–2
Tencent/Qihoo 360, 173–4, 257–9,
300
tiao kuai system, 194–5
transparency, lack of, 14–16, 95–7, 281,
310–11
TravelSky Cartel, 256–7, 279–80, 300,
306
value-added telecommunications
services (VATS), 53, 269–70,
274–5
variable interest entities (VIEs),
273–4
VATS. See value-added
telecommunications services
VIEs. See variable interest entities
Wal-Mart/Newheight, 269–70,
274–5, 300
Wang Xianlin, 167–9, 204, 210
Wang Xiaoye, 167–9, 204, 210
Western Digital/Hitachi, 39–40, 44–57
World Trade Organization (WTO),
influence on AML drafting,
206–7
Wu Hanhong, 172–3, 204
Zhang Weiying, 172–3
Zhang Xinzhu, 172–3, 204