

• **Summary**

This thesis focuses on predatory pricing in competition law of European Union and United states of America. The main goal of the thesis is to analyze the development of predatory pricing on the both sides of Atlantic and to show where the approach to predatory pricing is similar and where was used different perspective.

The thesis is divided to three chapters. First part of first chapter describes predatory pricing in general. It supplies a complete view on basic elements of predatory pricing that were and some still are used to identify them. Second part of first chapter brings overview of the most important tests of costs and basic economic terminology, that is important for price tests. Last part introduces most important schools of competition law, that had the biggest impact on forming of approaches to predatory pricing.

Second chapter deals with main milestones of development of predatory pricing in the United States. It brings chronological overview of laws and decisions of the U.S. Supreme Court, and analyses their importance for next judicial practice. End of this chapter summarizes development of predatory pricing in the USA on basis of foregoing findings.

Third chapter similarly describes historically younger, but equally dynamic development of predatory pricing in European Union.

At the end of this thesis is the comparison of approaches to predatory prices in European Union and USA. On courts decisions from second and third chapter describes list of main common features and distinctions. This comparison is then demonstrated on attached table. This thesis brings a conclusion, that however there has been a tendency of convergence of both approaches, there are still some major differences. Due divergence in goals of competition law in EU and USA, some of those differences will probably continue to prevail.