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October 6, 2008

BY EMAIL AND HAND DELIVERY

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex G)
600 Pennsylvania Ave., N.W.
Washington, DC 20580

Re: **Market Manipulation Rulemaking Workshop -
Request to Participate, P082900**

Dear Secretary Clark:

The American Petroleum Institute (“API”) hereby requests to participate in the public workshop concerning the petroleum market manipulation rulemaking, to be held on November 6, 2008 at the FTC’s Headquarters Building.

API is a national trade association representing the U.S. oil and natural gas industry. API’s more than 400 members cover all facets of the industry, including exploration, production, transportation, refining, and marketing. API submitted extensive comments on the Advance Notice of Proposed Rulemaking (“ANPR”) in this proceeding and intends to submit further comments in response to the Commission’s Notice of Proposed Rulemaking. API’s comments address each of the issues identified in the Commission’s notice announcing the public workshop: the basis for and contours of the proposed Rule; the element of scienter and the recklessness standard proposed by the Commission; and the Commission’s proposal not to require a showing of price effects in order to establish a violation of the Rule. As reflected by its comments on the ANPR, API is able to offer an industry-wide perspective on the issues raised by this rulemaking, as well as specific expertise on the trading and other practices to which those issues relate. API believes that its participation in the workshop would help to promote an informed and balanced exchange of views.

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API notes that the Commission has not yet released the agenda for the workshop. API requests an opportunity to discuss with Commission staff how it can best contribute to discussion of the various issues to be considered at the workshop. Based upon that discussion, API will suggest one or more individuals to participate as panelists at the workshop.

Please address communications concerning this request to:

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Respectfully submitted,


Robert A. Long