



October 6, 2008

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex G)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
mmr@ftc.gov

Re: Market Manipulation Rulemaking Workshop – Request to Participate, P082900

Platts, the energy information division of The McGraw-Hill Companies, Inc., requests to participate as a panelist at the workshop to be held November 6 on the Notice of Proposed Rulemaking (NPRM) on petroleum market manipulation on a provisional basis depending on the topics the Commission intends to cover. Per the Commission's September 16 notice, Platts intends to submit comments in this proceeding by October 17. Platts submitted June 23 comments (535819-00149) on the Advance Notice of Proposed Rulemaking.

Platts' forthcoming comments will focus principally on those areas where the proposed rule could affect price discovery in US petroleum markets. Platts' primary concern is how a final rule could affect price reporting in practice. As noted in the NPRM, "false reporting to private data reporting services ... done with the requisite scienter, in connection with the purchase or sale of a covered product at wholesale, would be covered by the proposed Rule."

If the workshop's agenda will include issues surrounding petroleum market price discovery and price assessments by private reporting services, Platts requests to participate as a panelist. As a global leader in price discovery in petroleum markets, Platts has extensive expertise in and knowledge of those issues, and its participation would promote a balance of interests represented at the workshop because of its central role in the price reporting process. Platts' likely representative would be Global Director of Oil John Kingston. If, however, the Commission does not anticipate a discussion of petroleum market price formation issues, Platts does not request to participate.

If not a panelist, Platts expects to attend the workshop and will present its views during the general public portion of the session as appropriate.

Contact information:

Ryan Work, Director of Government Affairs, McGraw-Hill, 1200 G St. NW, Suite 200,  
Washington, DC 20005, telephone 202-383-3704, fax 202-383-3718, e-mail  
[ryan\\_work@mcgraw-hill.com](mailto:ryan_work@mcgraw-hill.com)

Larry Foster, Global Editorial Director, Platts, 1200 G St. NW, Suite 1000, Washington, DC  
20005, telephone 202-383-2140, fax 202-383-2024, e-mail [larry\\_foster@platts.com](mailto:larry_foster@platts.com)