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October 6, 2008

VIA E-MAIL

Donald S. Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

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

Dear Secretary Clark,

On behalf of our client, the National Petrochemical and Refiners Association (NPRA), we hereby request the selection of NPRA to participate in the Commission's public workshop on November 6, 2008, in connection with the FTC's market manipulation rulemaking proceeding.

The NPRA has more than 450 members, which own or operate virtually all U.S. petroleum refining capacity and include most of the nation's petrochemical manufacturers. Many, if not most, NPRA members will be subject to any final market manipulation rule adopted by the Federal Trade Commission. As a result, NPRA members have studied the proposed rule in depth and have observations to contribute on the issues identified by the FTC in its Federal Register notice of Sept. 16, 2008. The NPRA, in conjunction with the American Petroleum Institute (API), submitted extensive comments in response to the FTC's first Federal Register notice, and NPRA will submit additional comments on the proposed rule in the FTC's second Federal Register notice. Charles T. Drevna, President of the NPRA, will represent NPRA at the workshop. Mr. Drevna has testified on behalf of NPRA before Congress and other governmental bodies numerous times, and he is well-versed on the issues that will be discussed at the FTC's public workshop.

Thank you for your consideration of this request. Please notify me if the NPRA has been selected to participate in the workshop.

Sincerely,

  
Susan S. DeSanti

cc: Gregory Scott, Executive Vice President and General Counsel, NPRA