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October 17, 2008


Federal Trade Commission
Office of the Secretary
Room H-135 (Annex G)
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Re: Market Manipulation Rulemaking, P082900

Dear Federal Trade Commission:

Enclosed are the Michigan Petroleum Association/Michigan Association of Convenience Stores' comments on the Advanced Notice of Proposed Rulemaking on the Prohibitions on Market Manipulation and False Information in Subtitle B of Title VIII of the Energy Independence and Security Act of 2007, promulgated in 16 CFR Part 317.

Thank you.

Cordially, 

Mark Griffin
President

**COMMENTS OF THE MICHIGAN PETROLEUM ASSOCIATION/
MICHIGAN ASSOCIATION OF CONVENIENCE STORES**

MARKET MANIPULATION RULEMAKING, P082900

October 17, 2008

I am the President of the Michigan Petroleum Association/Michigan Association of Convenience Stores ("MPA/MACS"). MPA/MACS represents approximately 500 member companies with over 1,500 retail locations which employ over 15,000 throughout all of Michigan's 83 counties. The majority of MPA/MACS members are independent petroleum distributors which own and operate retail gas stations/convenience stores, purchase petroleum products from refiners and distribute these products to dealer, farmer, commercial and home heating customers. I am submitting the following comments on the Federal Trade Commission's ("FTC") Notice of Proposed Rulemaking on the Prohibitions on Market Manipulation and False Information in Subtitle B of Title VIII of the Energy Independence and Security Act of 2007, promulgated at 16 CFR Part 317.

MPA/MACS members report the same experiences as described in the comments submitted, for example, by the Illinois Petroleum Marketers Association dated June 19, 2008 and September 3, 2008 and the Tennessee Oil Marketers Association dated June 20, 2008. MPA/MACS believes that allowing refiners and suppliers to continue with the practice of not allowing distributors to blend pure gasoline with ethanol¹ will result in higher prices to the consumer and an adverse effect on competition. Accordingly, the MPA/MACS adopts by reference these comments as its own comments

Cordially,

Mark Griffin//
President

¹This practice is effecuated by either not offering pure unblended gasoline at the terminal or by offering pure gasoline at an artificially high price.