



Office of the Secretary

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

November 15, 2010

Mr. Daniel C. Paulus  
Mr. Michael P. Dolan  
Paulus & Dolan, PLLC  
One Belle Meade Place  
4400 Harding Road, Suite 101  
Nashville, Tennessee 37205

Re: *In the Matter of Pilot Corporation, Propeller Corp., and Flying J Inc.,  
File No. 091-0125*

Dear Messrs. Paulus and Dolan:

Thank you for your comment on behalf of AMBEST, Inc. regarding the proposed consent order in the above-captioned matter. The Commission has reviewed your comment in connection with its decision whether to give final approval to the proposed consent order and has placed the comment on the public record.

After considering AMBEST, Inc.'s comment, among others, the Commission has determined that the public interest would be served best by issuing the Decision and Order in final form with certain modifications. First, Pilot Corporation and Propeller Corp. ("Pilot") shall be required to file reports notifying the Commission of relevant acquisitions, including fuel island leases. Second, the Decision and Order will mandate a broader firewall that will apply to all merchant customers of Pilot's TCH subsidiary for the length of the order.

We appreciate your interest in this matter. A copy of the final Decision and Order is enclosed for your information.

By direction of the Commission, Commissioner Brill not participating.

Donald S. Clark  
Secretary

Enclosure