



May 20, 2010

Filed Electronically

Matthew Wilshire
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission

Subject: Comments on FTC's proposed changes to the Automotive Fuel Ratings,
Certification and Posting Rule (R811005)

Dear Mr. Wilshire:

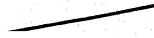
Valero Energy Corporation (Valero), one of the largest refiners and ethanol producers is pleased to provide the following comments on the FTC's proposed changes to the Automotive Fuel Ratings, Certification and Posting Rule (R811005).

Valero supports all of the comments filed by the NPRA on this rule. In particular, Valero strongly supports three items:

1. Ethanol Blend Pump Labels – The FTC should postpone any rulemaking until the EPA acts on this issue to ensure that only one pump label that meets both agencies requirements is needed.
2. Renewable Diesel Labeling – Given the inability to test for renewable diesel and the fact that co-processed renewable diesel is not considered renewable diesel, the FTC should not require any renewable diesel labeling, or if it does it should make the labeling requirements voluntary or required only if the station owner knows that renewable diesel is in the diesel.
3. Octane Rating – The FTC should allow the use of infrared methods provided they are correlated with the ASTM referee methods and conform to ASTM D26122-10 to lower cost to consumers and improve accuracy of octane ratings.

We appreciate your time in considering our comments. If you have any questions please feel free to contact me.

Sincerely,



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