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Federal Trade Commission
Office of the Secretary
Room H-113 (Annex N)
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Submitted via: https://ftcpublic.commentworks.com/ftc/autofuelratingscertnprm

Re: Fuel Rating Rule Review, 16 CFR Part 306, Project No. R811005;
79 *Fed. Reg.* 18850 (April 4, 2014)

BP America (BP) appreciates the opportunity to submit comments on the proposed rule. BP is a major producer of oil and natural gas in the US and one of the nation's largest investors in energy development.

Dispenser Labeling

BP supports the comments submitted by the American Petroleum Institute (API) and by the American Fuel & Petrochemical Manufacturers (AFPM) regarding dispenser labeling.

Automotive Fuel Rating Using Near Infrared Spectroscopy (NIR) Techniques

The Federal Trade Commission (FTC) is proposing using NIR techniques to determine the research and motor octanes of gasoline. The NIR method is a correlative technique that depends upon a primary measurement of a property and then relates those primary measurements to the spectra of the fuel (this is sometimes referred to as the "training data").

BP does not support this proposal. For gasoline blended with lower amounts of ethanol, i.e. E10, BP believes the approval of correlative techniques for measuring octane in these fuels should first be approved by the combustion measurement experts at ASTM International (ASTM). The expertise on octane testing lies with ASTM, and they should approve new technologies as test alternates before a government agency does. BP supports the US Office of Management and Budget (OMB) Circular A-119 (revised) "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities" as the basis for having ASTM consensus expertise first approve correlative octane methods.[1] Thus, it is BP's position that the FTC should wait for ASTM to endorse the correlative methods for octane before the FTC endorses them.

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[1] http://www.whitehouse.gov/omb/circulars_a119/

BP does support the API and AFPM position that the ASTM engine test methods for octane determination (ASTM D2699-13 and D2700-13) must be the referee test methods over other correlative methods. This is because these engine tests actually measure the fuels' resistance to pre-ignition ("knock") tendency compared to other techniques that do not actually measure this fundamental property.

BP appreciates this opportunity to comment on the proposed rule. Please feel free to contact me at 202-346-8516 or at janice.raburn@bp.com if you have any questions or comments.

Sincerely,

Janice K. Raburn
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