

Sent via Email
December 2, 2011

Mr. Kevin Ferrick, API

Dear Kevin:

ACC PAPTG would like to be assured that the concerns discussed in the NCET call on October 7, 2011 are considered as the PC-11 category development is initiated. Our recommendation to move forward from NCET to NCDT was based on the understanding that NCDT would address our concerns.

In addition, to the defined tasks set in API 1509 Appendix D, as part of the ACC NCET sign off, the following items were stated as necessary to be addressed by the NCDT for PC-11:

- 1. What is the practicality of placing two new categories in the market? How will the consumer respond? What education is needed? Do we have Oil Marketer input?
- 2. Do we have confirmation that EPA is in agreement that HTHS is sufficient for defining improved fuel efficiency?
- 3. Have the Needs been fully defined and supported?
- 4. Is there a way to spread the development costs over a longer timeframe?
- 5. Have EMA and API discussed how the categories will be defined and provided a plan for customer education?
- 6. Is there a fail-safe proposal to protect end users?

In addition, at the subsequent API LG meeting, you began to assemble a list of questions for the NCDT to answer. Specifically stated during the meeting were:

- 1. Clarify the need for a separate Energy Conserving category
- 2. Provide a better definition for the funding of the engine test matrices required.

ACC is reiterating these questions at this time because we feel it is imperative that NCDT develops and communicates a plan to address these outstanding issues to ensure we can move the development of the new category forward in a timely manner.

Sincerely,

Jerry Wang

Jerry Wang PAPTG Chair

Doug Anderson

Doug Anderson PAPTG Manager

