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November 2, 2006

Mr. James Newson, Chairman  
Lubricants Committee  
American Petroleum Institute  
1220 L Street, N.W.  
Washington, D.C. 20005-4070

Dear Jim:

The Independent Lubricant Manufacturers Association (“ILMA”) supports and encourages the American Petroleum Institute’s (“API”) Lubricants Committee to adopt a licensing program for automatic transmission fluids (“ATFs”) similar to the current API Engine Oil Licensing and Classification System (“EOLCS”) for automotive engine oils. As discussed further below, independent lubricant manufacturers believe there is a clear and demonstrated need for a voluntary licensing and certification program that authorizes ATF marketers who meet specified requirements to use designated quality marks in the marketplace.

ILMA is convinced that significant market demand for Dexron III /Mercon-type fluids will continue well after General Motors (“GM”) and Ford Motor Company (“Ford”) discontinue their licensing systems in 2007. While ILMA understands the automakers’ position concerning the backward compatibility of their new ATFs, we are convinced that there are numerous and common-sense reasons – such as, past experiences, owner’s manual recommendations, and price -- why installers and consumers will continue to look to the Dexron III/Mercon-type fluids. ILMA is concerned that without a licensing system for these ATFs, unsuitable fluids will appear in the market causing obvious transmission problems and significant increased costs to consumers.

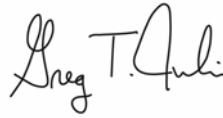
I am certain that the API Lubricants Committee is aware that there are many industrial applications that utilize Dexron/Mercon quality level fluids. The quality of these fluids has remained consistently high because of the GM and Ford licensing programs. These industrial applications also may fall victim to possible sub-standard products if no program exists to assure minimum quality levels. Sub-standard fluids will lead to shorter equipment life and system failures.

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Accordingly, ILMA endorses and will cooperate fully in the development of an API licensing program that will ensure that ATFs in the marketplace have the "pedigree" to tie back to the previous OEM quality systems. We look forward to working with the API Lubricants Committee on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Greg T. Julian". The signature is written in a cursive style with a large initial "G" and "J".

Greg T. Julian  
President

cc: ILMA Board of Directors  
Celeste M. Powers, CAE  
Jeffrey L. Leiter, Esq.  
Larry Kuntschik  
George Tiffany  
Kevin Ferrick