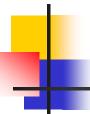


ACC Position on C13 Timing

October 27, 2005



C13 Assumptions

- Ten C13 stands available in the industry
- One month per test → ten tests per month
- 30% to 50% pass rate

→ Three to five passes per month



C13 Assumptions – Best Case

- 36 passes required if full BOI/VGRA guidelines are granted
 - All BOI/VGRA guidelines roll over from the Cat 1R to the C13 by 1/1/2006
- Seven to twelve months to complete



C13 Assumptions – Mid Case

- 73 passes required if only C13 BOI guidelines are granted
 - Full BOI guidelines in place by 1/1/2006
 - No VGRA guidelines are granted for the C13
 - → Fifteen to twenty-four months to complete



C13 Assumptions – Worst Case

- 223 passes required without enabling C13 guidelines
 - No BOI guidelines are granted
 - No VGRA guidelines are granted
 - → Four to six years to complete



Considerations

- Without testing relief for the C13 test:
- The October 2006 deadline requested by EMA will be missed by several years
- All oil marketers will be affected



A Proposed Solution

- Agree Caterpillar C13 BOI/VGRA guidelines through the API BOI/VGRA Task Force
 - Perhaps in conjunction with existing Caterpillar 1P BOI/VGRA guidelines
- If this is not successful, seek
 Caterpillar C13 testing relief through the HDEOCP