

Letter to ASTM L-37 Surveillance Panel with copy to B3 Chairman, B0 Chairman, and D2 Chairman

Members of the Surveillance Panel,

Afton would like to formally comment on the recently approved motion regarding L-37 test hardware replacement which occurred at the Nov 2, 2011 L-37 Surveillance Panel meeting and request that this letter be appended to the meeting minutes.

Afton is supportive of the Surveillance Panel's efforts to develop appropriate hardware replacement for the L-37 test that provides equivalent oil performance as with the historic hardware. ASTM D6121 is a globally accepted standard which is used to prove oil performance in virtually all regions of the world and is critical to OEMs, oil marketers and additive manufacturers.

With potentially only a few years of approved L-37 parts available to the industry, a motion was made by Mr. Zakarian and seconded by Mr. Koehler: 'Move forward with the AAM 'Zeta' next generation L-37 hardware replacement proposal. The group will not seek additional Dana hardware after the current situation is resolved. The labs will work together to effectively use the remaining Dana hardware. The labs will investigate any concerns with the proposal as they work to implement the test.' The motion passed with a vote of 7-Yes, 1-No (Afton), and 1-Abstain. Afton voted negative based on data that found two (2) of seven (7) commercially available API GL-5 and/or SAE J2360 oils did not pass with the proposed new hardware.

With the approved motion, the L-37 Surveillance Panel has selected a single path forward which must now follow the established principles and guidance of ASTM, including:

- Formation of a balanced interest Task Group to develop the hardware replacement
- Selection of a Task Group Leader
- A defined Scope and Objectives for the Task Group
- A timetable for completion of the objective

Formation of a Task Group and balance of interests: Afton recommends that Task Group membership be held to a manageable number with preference to those who are able to make significant contributions via knowledge, tests, parts or finance. This ensures a committed, tightly focused group with significant interest in delivering the replacement L-37 test. Afton commits to being a major contributor in this effort by purchasing axles, donating tests, and bringing significant gear, lubricant and testing expertise to the Task Group.

Selection of a Task Group Leader – This is an important position. The selected individual should have the backing of their company and the leadership to keep the Task Group focused, on time, and in compliance with ASTM guidelines. Afton recommends that the leader be from one of the independent labs and nominate Brian Koehler.

Defined Scope and Objectives - The Scope and Objectives must mirror those of the L-37 Surveillance Panel and ASTM D02.B3. We propose the following:

Scope: The scope of the Task Group is to develop an equivalent hardware replacement for the L-37 test that can be incorporated into ASTM D6121 and maintains the identical discrimination of oil performance as the current hardware.

Objectives:

Key objectives should include:

'Keep existing performance tests operational, at historic severity and precision levels.' **Please note: if historic severity levels and oil performance discrimination cannot be maintained, a new gear lubricant category (API GL-X) may be needed. API GL-5 would become obsolete as the hardware is no longer available to qualify oils in an equivalent manner to approved oils that are currently in the field.**

'Ensure that performance test parts and reference oils are available in adequate supply and of a consistent quality.' **Please note: This is imperative to ensure that once replacement hardware is developed that no unintended changes occur as the industry begins to qualify and approve oils.**

Timetable for completion of objective: Afton believes that a reasonable timeline for development of the replacement hardware should target completion in 1-2 years, but caution that this target date should not create such haste that the Task Group is not able to adequately complete their work.

We further recommend that the Task Group be formed within the next few weeks and suggest an L-37 Surveillance Panel or ASTM D02.B3 meeting or conference call be held prior to the ASTM D02.B0 meeting on December 9, 2011. This will help to solidify the membership and tasks that must be accomplished and allows a report of these activities at the ASTM D02.B0 meeting.

Sincerely,

Dan Pridemore
Afton Chemical
ASTM D2. B0 member
Email: dan.pridemore@aftonchemical.com
Phone: 248-350-0640