



September 21, 2009

Ms. Rene Orr
5-Year Program Manager
Department of the Interior
Minerals Management Service
Attention: Leasing Division (LD)
381 Elden Street
MS-4010
Herndon, VA 20170-4817

RE: Minerals Management Service (MMS) Request for Comments on the Draft Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2010 - 2015 (74 Federal Register No. 12; January 21, 2009)

Dear Ms Orr:

The American Trucking Associations, Inc. (ATA) is pleased to comment on the Minerals Management Service (MMS) Request for Comments on the Draft Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program 2010 - 2015. ATA is the trade association that represents the interest of the U.S. trucking industry. Directly and through its affiliated organizations, ATA encompasses over 37,000 companies and every type and class of motor carrier operation.

The trucking industry is the lynchpin of the transportation system, hauling nearly 69 percent of all domestic freight transportation tonnage in the United States in 2008 and accounting for 83 percent of all domestic freight transportation revenue. Over 80 percent of all towns and communities in the U.S. get the goods they consume exclusively from trucks. Trucking also accounts for a majority of the value of trade between the U.S. and Mexico and Canada.

In order to move the U.S. economy, the motor carrier industry consumes over 39 billion gallons of diesel fuel annually. In 2008, the industry paid a staggering \$150.9 billion for diesel fuel, a \$36.5 billion increase over 2007 and more than double what it paid in 2004.

For most motor carriers, the cost of fuel is the second largest expense after labor. It can account for upwards of 25 percent of total expenses in normal years and significantly more than that during diesel price spikes. Trucking is an extremely competitive industry comprised largely of small businesses. Roughly 96% of all interstate motor carriers operate 20 or fewer trucks, according to the Federal Motor Carrier Safety Administration. Small carriers are particularly vulnerable to the large and swift increases in fuel prices that we have seen over the last couple of years.

The U.S. economy depends upon a healthy trucking industry to ensure the efficient delivery of virtually all consumer products; with that in mind, the federal government needs to ensure that the industry has access to adequate supplies of high quality fuel at reasonable prices so that motor carriers can continue to deliver America. While the motor carrier industry has implemented a number of voluntary programs to conserve fuel, reducing consumption is only one part of the solution to our energy problems. A comprehensive solution to the energy crisis also depends upon increasing domestic supplies of petroleum.



The offshore leasing program is a critically important component of the supply side of a comprehensive energy strategy. For this reason, ATA has a direct and a strong interest in the offshore leasing program. We are writing in strong support of developing, in an environmentally responsible manner, more domestic oil and natural gas resources off our coasts by enlarging the areas offered for sale in the OCS leasing program for 2010–2015. If recent events have taught us anything, it is that our nation must develop domestic energy supplies. This cannot be done if the federal government continues to deny access to 85 percent of the country's offshore oil and gas resources.

These offshore areas are home to huge, untapped resources of oil and natural gas that are crucial to keeping our economy and our country going strong. The MMS estimates that the undiscovered federal OCS resources which are currently off limits and could be recovered with today's sophisticated technology are 18 billion barrels of oil and 77 trillion cubic feet of natural gas. The resources expected to be produced from these areas represent enough natural gas to heat 15 million households for more than 77 years. Additionally, these areas can produce enough energy to power over 20 million cars and heat 956,000 households for 30 years. Alaska's OCS, for instance, contains huge potential resources. We ask MMS to keep these resources available for leasing and to work to ensure that exploration and production activities can take place in those leases that are currently held in Alaska's OCS.

MMS should make access to all OCS areas a high priority for our nation. The next OCS Leasing Program should retain the 31 proposed lease sales in 12 OCS areas to improve our energy security, support future economic growth and to help reduce our dependence on imports. The trucking industry urges the MMS to open all proposed areas of the OCS to environmentally responsible oil and natural gas production.

Opening all available domestic resources to safe and environmentally responsible development can significantly boost U.S. supplies of oil and natural gas; increase the nation's energy security; add more well-paying American jobs; help with our balance of payments and economic growth during these tough economic times, and bring billions of dollars into the Treasury instead of sending them abroad.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Costello".

Bob Costello
Chief Economist & Vice President