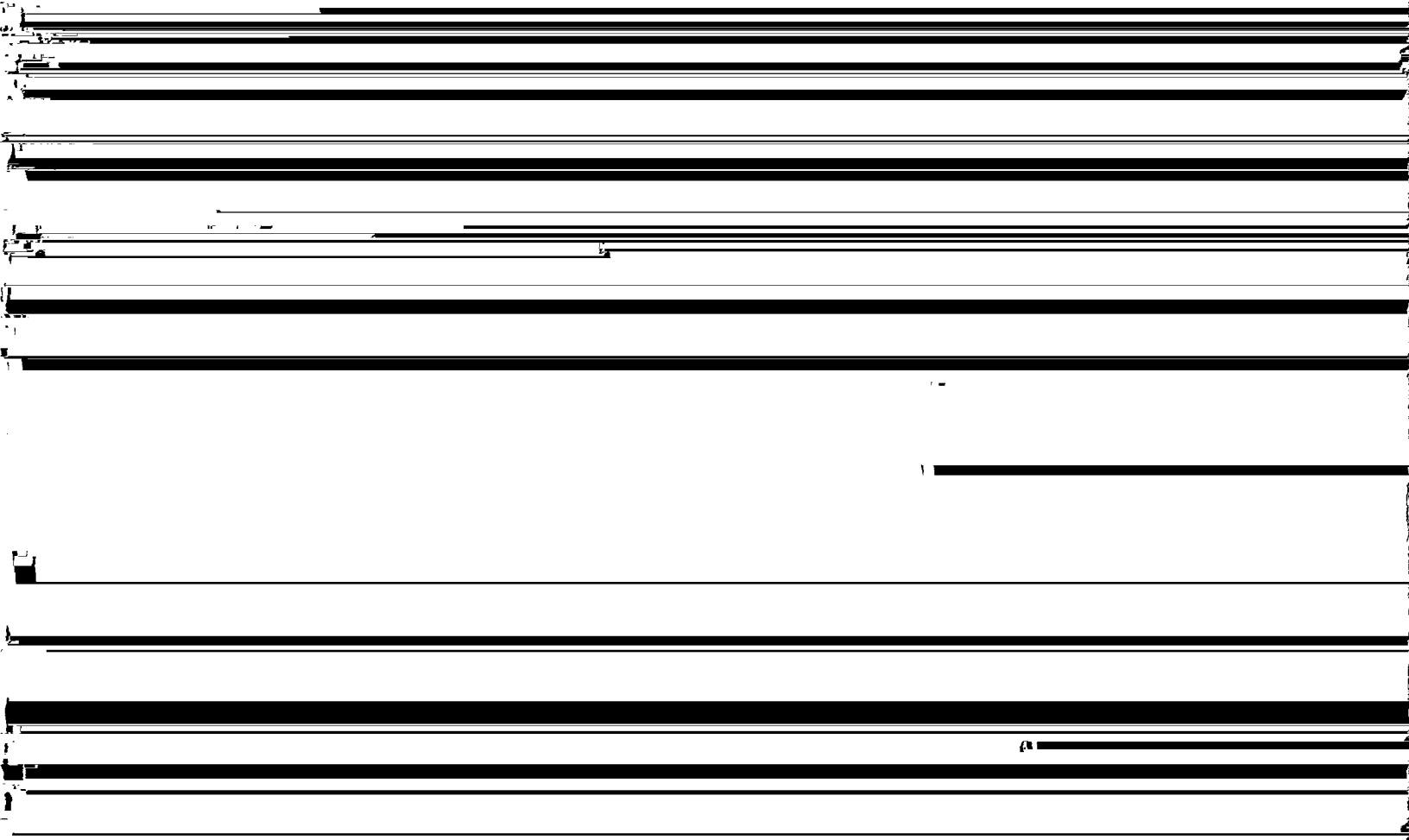


UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)	
)	
THE ASSOCIATED OCTEL)	
COMPANY LIMITED,)	
)	Docket No. C-3913
a corporation,)	
)	

Request for Approval of Modifications

On December 22, 1999, the Commission issued its Decision and Order in the above-captioned matter (the "Order"). Paragraph II of the Order requires The Associated Octel Company Limited ("Octel") to supply AllChem Industries, Inc. with Tetra Ethyl Lead Additives ("TEL" or the "Compound") for 15 years pursuant to a Supply Agreement dated July 30, 1999



price using the average index price for the year versus the average index price for the month of September, thus preventing an unfair price to AllChem if the September index price is an outlier. Octel agreed to these changes.

- In 2004, the parties agreed that they would use the [REDACTED] of the GSO: ~~Chemical & Chemical Products Index. The parties also agreed that the [REDACTED]~~

particular series and the parties agreed that the [REDACTED] was more appropriate ~~than the general index for TEL. The parties also agreed that the [REDACTED]~~

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In the Matter of

)
)

II. SECTION IV

Octel has not entered into any contract modification contract agreement or

creation or dissolution of subsidiaries or any other change in such company's structure.

compliance obligations arising out of the First Order.

VI SECTION V

Octel has provided all of the notifications and has received appropriate acknowledgements from Octel officers.

Section X of the First Order.

its investigation, and a description of the new procedures that have been instituted by Octel to ensure future compliance.

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

(Redacted)

New Procedures

Mr. Hartley Octel's new General Counsel has implemented

Octel will comply fully with the FTC order unless

individual responsible for the TET business

BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)

THE ASSOCIATED OCTET)

) CONFIDENTIAL TREATMENT REQUESTED

Public Record Version

VERIFICATION

I, Andrew Hartley, declare under penalty of perjury that:

1. I am General Counsel and Company Secretary of the Associated Otel Company Limited; and

2. I am the 2008 Annual Consolidated Compliance Report for Docket No. C

6916... 2012... the Federal Trade Commission by the Associated Otel