Office of the Secretary

Mr. Christopher Courts

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

November 15,2010

Sr. Vice President and General Manager EFS Transportation Services, Inc.
2525 Horizon Lake Drive
Suite 120

Memphis, TN 38133

Re: In the Matter of Pilot Corporation, Propeller Corp., and Flying J Inc.,
File No. 091-0125

Dear Mr. Courts:

Thank you for your comment on behalf ofEFS Transportation Services, Inc. ("EFS") regarding the proposed consent order in the above-captioned matter. The Commission has reviewed your comment in connection with its decision whether to give final approval to the proposed consent order and has placed the comment on the public record.

After considering EFS' s comment, among others, the Commission has determined that
the public interest would be served best by issuing the Decision and Order in final form with certain modifications. First, Pilot Corporation and Propeller Corp. ("Pilot") shall be required to file reports notifying the Commission of relevant acquisitions, including fuel island leases. Second, the Decision and Order will mandate a broader firewall that will apply to all merchant customers of Pilot's TCH subsidiary for the length of the order.

We appreciate your