August 28, 2026

Attention: Visa Inc. Merchant Interchange Policy / Client Relations
900 Metro Center Boulevard
Foster City, CA 94404
(or via P.O. Box 8999, San Francisco, CA 94128-8999)

Re: Request to Extend Visa Utility Interchange Eligibility to Delivered Heating Fuels (MCC 5983)

Dear Visa Merchant Relations Team:

On behalf of the Energy Marketers of America (EMA) and the thousands of independent, family-owned energy marketers we represent through our 48 state and regional member associations, I write to respectfully request that Visa expand eligibility under its CPS/Utility interchange program (or an equivalent flat-fee utility rate structure) to include delivered residential and commercial heating fuels classified under Merchant Category Code (MCC) 5983 – Fuel Dealers – Fuel Oil, Wood, Coal, and Liquefied Petroleum.

EMA members supply heating oil, propane, bioheat blends, and related fuels to more than five million homes and businesses nationwide. These deliveries constitute an essential household energy service—comparable in character and risk profile to the electric, natural gas, water, and sanitary services that currently qualify for Visa's preferential utility rates under MCC 4900.

As you know, Visa's published rules currently exclude propane gas, home heating oil, and similar delivered fuels from MCC 4900 eligibility and from the associated CPS/Utility flat-fee structure (commonly $0.75 per transaction for consumer credit products, including many Signature and Signature Preferred cards). In contrast, Mastercard has long allowed these same fuel dealers to qualify for low flat utility-style rates. The result is a material cost disparity: Visa Signature and other premium rewards cards frequently clear at significantly higher percentage-based rates for our members, even when the underlying transaction involves routine, low-risk home energy delivery.

This disparity places independent heating-fuel marketers—who already operate on thin margins—at a competitive disadvantage and increases the cost of providing an essential service to American households. Extending utility-rate eligibility to MCC 5983 transactions (or creating a parallel flat-fee program for delivered heating fuels) would:

- Align Visa treatment more closely with Mastercard practice and with the low-risk nature of these payments;

- Reduce processing costs that are ultimately borne by consumers or absorbed by small businesses;
- Recognize the essential, utility-like role of delivered heating fuels, particularly in regions without natural-gas infrastructure; and
- Support broader Visa goals of promoting card acceptance for recurring essential services.

We understand that any change would need to preserve program integrity, including appropriate data requirements, registration (e.g., Merchant Verification Value where applicable), and safeguards against misuse. EMA stands ready to work collaboratively with Visa, our members' acquirers, and processors to define clear eligibility criteria limited to bona fide residential and commercial heating-fuel deliveries.

We would welcome the opportunity to discuss this request further. Please contact me directly at runderwood@emamerica.org or 703-351-8000.

Thank you for your consideration of this important issue for America's independent energy marketers and the households they serve.

Sincerely,

Rob Underwood
President
Energy Marketers of America

cc: EMA Heating Fuels Committee