



September 4, 2020

Mr. William H. Foege, Co-Chair
Ms. Helene D. Gayle, Co-Chair
Committee on Equitable Allocation of Vaccine for the Novel Coronavirus
National Academies Sciences, Engineering, and Medicine
500 Fifth St. N.W.
Washington, D.C. 20001

Re: Discussion Draft of the Preliminary Framework for Equitable Allocation COVID-19 Vaccine

Dear Mr. Foege and Ms. Gayle,

Our national associations,¹ representing the convenience and fuel retailing industry, applaud the efforts of your committee to evaluate and propose a distribution framework by which the federal government can ensure a vaccine is distributed in a fair and impactful manner. Our industry is not alone in looking forward to the day when Americans can access a vaccine and eventually return to life as it was before COVID-19.

In general, we agree with the structure put forward by your committee to prioritize certain populations for vaccination based on circumstantial factors and factors of health and age. As we read your framework, the majority of our employees, those serving on the front lines of the fuel and food distribution systems across the country up to and including consumer-facing retail of these critical products, would fall into phase II of vaccine deployment. We think that is an appropriate classification for our industry's employees given their necessity to the day to day operations of first responders as well as every industry across the country. Without our industry getting motor fuels to market, for example, front-line workers throughout all industries would be unable to get to work – halting the economy and preventing first responders from getting to those in need. America's truck drivers rely on our members' operations remaining operational 24 hours

¹ NACS is an international trade association representing the convenience store industry with more than 2,200 retail and 1,600 supplier companies as members, the majority of whom are based in the United States. NATSO currently represents approximately more than 3,000 travel plazas and truck stops nationwide, comprised of both national chains and small, independent locations. PMAA member associations represent wholesalers and retailers of gasoline, diesel, heating oil, lubricants and renewable fuels. Additionally, these companies supply motor fuels to 40,000 independently owned retail outlets. SIGMA represents a diverse membership of approximately 260 independent chain retailers and marketers of motor fuel.

per day in order to continue delivering food and medical supplies throughout the country and keeping our country's supply chain moving. The food and convenience items our industry provides are also critical as our industry often has the most convenient locations and allows for quick shopping trips for American consumers. This is also helpful for first responders, especially because stores in our industry are typically the only ones open extended hours (or 24 hours per day) to serve their needs.

In the report, your committee distinguishes those workers deemed essential critical infrastructure workers from critical risk workers. The report states that critical risk workers are both working in critical industries but also unable to telework and avoid risk. With respect to the industries that ensure adequate food and fuel supply across the country, this must be a broad classification for the nation to be able to function. We believe retail workers, truck drivers hauling both fuel and freight, and the wholesale operations ensuring our fuel and food supply is maintained *all must* be placed into the critical risk worker category. This population has put itself at risk since the beginning of the pandemic, working despite health concerns, and we believe they should be prioritized in phase II of the vaccine deployment.

The Department of Homeland Security's Cybersecurity and Infrastructure Security Agency recognized early on the importance of our industry to ensure Americans had food in markets, fuel at gas stations, and safe places for truck drivers to stop as they haul essential items across the country. In the deployment of a vaccine to protect Americans from COVID-19, that recognition should be applied to these critical workers.

We appreciate your consideration of our comments and sincerely thank you for the hard work your committee has done to provide a thoughtful approach to a very complex problem.

Sincerely,

National Association of Convenience Stores
National Association of Truckstop Operators
Petroleum Marketers Association of America
Society of Independent Gasoline Marketers of America