



October 27, 2025

Patrick A. Penn
Deputy Under Secretary
Food and Nutrition Service
Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

**RE: Request for Extension – Updated Staple Food Stocking Standards for
Retailers in the Supplemental Nutrition Assistance Program, RIN 0584-AF12**

Dear Deputy Under Secretary Penn,

On behalf of the National Association of Convenience Stores (NACS), NATSO, Representing America's Travel Centers and Truck Stops, and SIGMA: America's Leading Fuel Marketers (together the “Associations”),¹ we respectfully request a 60-day extension of the comment period for the Food and Nutrition Service’s (“FNS” or “the Agency”) proposed rule, Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program (RIN 0584-AF12).

Our members operate convenience stores, gas stations, truck stops, and travel centers in urban, rural, and suburban communities across the country. These stores are essential partners in the Supplemental Nutrition Assistance Program (“SNAP”), especially in areas with few grocery options. Our members provide their SNAP customers with convenient locations and extended hours, enabling them to purchase a wide variety of food and beverage items at any time of day or night. Their locations are often the only establishments easily accessible by walking or public transportation, or the only food retail locations open for business after a late work shift ends or before an early one begins. Convenience stores alone make up the majority of the total number of authorized SNAP outlets nationwide, demonstrating how critical the industry is to ensuring food access for SNAP beneficiaries.

FNS understandably took considerable time to craft this proposed rule, and stakeholders need a similar opportunity to review, evaluate, and provide meaningful input. Before submitting feedback on any public comment period, the Associations must gather feedback from our members. This approach will ensure that the Associations can provide FNS with a substantive, data-driven response to its recent proposal. However, the current comment deadline would significantly truncate this process, making it difficult for the Associations to develop the complete and thorough comments this rulemaking requires.

¹ NACS is an international trade association representing the convenience store industry with over 1,500 retailer and 1,600 supplier companies as members, the majority of which are based in the United States. NATSO currently represents approximately 5,000 travel plazas and truck stops nationwide, comprising both national chains and small, independent locations. SIGMA represents a diverse membership of approximately 260 independent chain retailers and marketers of motor fuel.

Specifically, in order to provide the Agency with detailed and meaningful comments, NACS is conducting an in-depth survey of its membership to assess how the changes would affect operations, product availability, and participation in SNAP. Given the technical nature of the proposal, the survey is extensive and requires significant time to complete. While some members have responded to date, the majority, including many single-store operators, continue to gather information that will inform the Associations' comments. Single-store operators make up more than 60 percent of the convenience retail industry, and they often face administrative and resource constraints that make gathering and submitting detailed information a more challenging process.

Importantly, because of the pause in ongoing dialogue with the Agency due to the government shutdown, stakeholders now have less opportunity to engage with FNS in the current timeframe. Agency staff have alerted each of the Associations that they are not taking external meetings until the government returns to normal operations. Extending the comment period will allow these important conversations to resume and ensure that FNS receives thorough, data-driven feedback.

For these reasons, the Associations respectfully request that FNS extend the comment period by an additional 60 days. Thank you for your consideration. We look forward to continuing to work with the Agency on this important rulemaking.

Sincerely,

National Association of Convenience Stores (NACS)
NATSO, Representing America's Travel Centers and Truck Stops
SIGMA: America's Leading Fuel Marketers