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January 9, 2012

Ms. Judy Cardin, Chair
National Conference on Weights and Measures
Laws and Regulations Committee
2811 Agriculture Drive, PO Box 8911
Madison, WI 53718

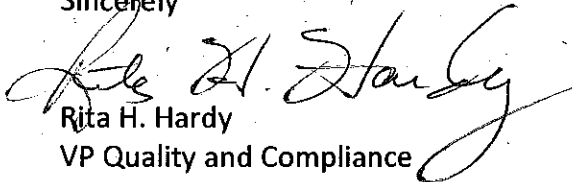
Dear Ms. Cardin,

We have reviewed L&R item 237-2 Section 2.1.7. Minimum Motor Octane Number. and the comments from the regional weights and measures associations as published in the NCWM Publication 15. We are in agreement with the report from the 2011 Southern Weights and Measures Association L&R Committee and the two exceptions they cite; keep the 1.0 psi waiver in 2.1.3.a. and modify 2.1.2.a 2 by changing 10 % ethanol to 15% ethanol.

We support this proposal with the two exceptions as a reasonable approach to harmonize NIST Handbook 130 with ASTM D4814 without significantly increasing refinery costs that could potentially lead to decreasing supplies.

Thank you for the opportunity to comment on this proposal.

Sincerely


Rita H. Hardy
VP Quality and Compliance

cc: Don Onwiler, NCWM Executive Director
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Lincoln, Nebraska 68508