

July 11, 2016

Delivered electronically

Don Onwiler
Executive Director
National Conference on Weights and Measures
1135 M Street, Suite 110
Lincoln, Nebraska 68508
don.onwiler@ncwm.net

Dear Mr. Onwiler:

On behalf of ACE, API, NACS, NATSO, PMAA, RFA, and SIGMA*, we respectfully request your support for item 237-2, "Section 2.1.2. Gasoline-Ethanol Blends" which will be a voting item during the NCWM Annual meeting in Denver. This voting item extends the sunset date from May 1, 2016 to May 1, 2017 for the 1.0-psi vapor pressure waiver for non-summer gasoline (Class A, B, C, D) and a 0.5 psi vapor pressure for class E gasoline. Additionally, item 237-2 makes the effective date July 28, 2016, the day that the Conference votes at the Annual meeting.

The vapor pressure waiver for summer gasoline is granted by the U.S. EPA through the Clean Air Act. During the non-summer months of September 16 to May 31, the vapor pressure waiver is critical to the fungibility of the U.S. gasoline supply. By supporting item 237-2, you are allowing the gasoline-ethanol blend, used for decades, to continue to be used for another year while ASTM works to modify its gasoline specification.

We thank you for your attention to this issue. If you have any questions or concerns regarding this matter, please contact Prentiss Searles, API at 202-682-8227 or searlesp@api.org.

Sincerely,

Brian Jennings, American Coalition for Ethanol

Prentiss Searles, American Petroleum Institute

Paige Anderson, National Association of Convenience Stores

David Fialkov, National Association of Truck Stop Operators

Rob Underwood, Petroleum Marketers Association of America

Kelly Davis, Renewable Fuels Association

R. Timothy Columbus, Steptoe & Johnson (Counsel to Society of Independent Gasoline Marketers of America)

cc: Jerry Buendel, Chairman, Board of Directors
Kristin Macey, Chairwoman-Elect, Board of Directors
Ronald Hayes, Past Chairman, Board of Directors
Richard Lewis, Laws and Regulations Chairman

* The following are descriptions of each organization

The American Coalition for Ethanol (ACE) is powered by people who have built an innovative industry that sustainably delivers clean fuel and valuable food for a growing world. These farmers, ranchers, Main Street businesses, scientists, investors, and renewable fuel producers work together to inform consumers and elected officials that in addition to helping keep gas prices low, creating jobs, improving the economy, displacing foreign oil, and reducing greenhouse gas emissions, ethanol delivers a great deal of human good.

The American Petroleum Institute (API) is the only national trade association representing all facets of the oil and natural gas industry, which supports 9.8 million U.S. jobs and 8 percent of the U.S. economy. API's more than 645 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 30 million Americans.

National Association of Convenience Stores (NACS) is an international trade association composed of more than 2,200 retail member companies and more than 1,800 supplier companies doing business in nearly 50 countries. The convenience and petroleum retailing industry has become a fixture in American society and a critical component of the nation's economy. In 2015, the industry employed more than two and a half million workers and generated \$574.8 billion in total sales, representing approximately 3.2 percent of the United States' GDP – or one of every 30 dollars spent.

National Association of Truck Stop Operators (NATSO) has been representing travel plaza and truckstop owners and operators for over 50 years and pursues a clear mission: to advance the success of truckstop and travel plaza members by delivering solutions to members' challenges and achieving the public policy goals of the truckstop and travel plaza industry. Headquartered just outside Washington, D.C., NATSO is the only national trade association representing the travel plaza and truckstop industry. NATSO advances the industry's interests by influencing government action and public opinion on highway issues such as commercialization, tolling and truck parking, and represents the industry on environmental and fuel issues.

Petroleum Marketers Association of America (PMAA) member associations represent 8,000 independent petroleum marketing companies who represent wholesaler and retailers of gasoline, diesel, heating oil, lubricants and renewable fuels. PMAA marketers own 60,000 retail fuel outlets such

as gas stations, convenience stores and truck stops. Additionally, these companies supply motor fuels to 40,000 independently owned retail outlets and heating oil to seven million homes and businesses. They sell their product under either their own private brand or the trademark of their supplier.

Renewable Fuels Association (RFA) is the leading national trade association for the domestic ethanol industry. Its mission is to advance the development, production, and use of fuel ethanol by strengthening America's ethanol industry and raising awareness about the benefits of renewable fuels. RFA's 300-plus members are working to help America become cleaner, safer, energy independent and economically secure.

Society of Independent Gasoline Marketers of America (SIGMA) represents approximately 260 independent chain retailers and marketers of motor fuel. SIGMA members represent significant diversity within the industry. While 92 percent are involved in gasoline retailing, 66 percent are involved in wholesaling, 36 percent transport product, 25 percent have bulk plant operations, and 15 percent operate terminals. Member retail outlets come in many forms including travel plazas, traditional "gas stations," convenience stores with gas pumps, cardlocks, and unattended public fueling locations. Some members sell gasoline over the Internet, many are involved in fleet cards, and a few are leaders in the mobile refueling movement.