

From: John Duff <john@sorghumgrowers.com>
Sent: Thursday, October 04, 2018 7:14 PM
To: Tyler Reeder <tyler.reeder@ncwm.net>
Subject: Opposition to FLR-8 Section 3.2.5. Prohibition of Terms

To whom it may concern,

I am writing to you today on behalf of National Sorghum Producers, a trade association representing 50,000 sorghum producers in Washington, D.C., and several state capitols. We also speak for the sorghum industry as a whole, representing those who rely on sorghum producers from other areas in the supply chain.

Approximately 30% of U.S. sorghum is used to produce ethanol, predominately in Kansas and Texas. Almost 80% of the crop is produced in these two states, so our producers are highly invested in the future of ethanol demand here.

As ethanol advocates, we want to state our strong opposition to the proposal to restrict product terms for gasoline-ethanol blends, specifically FLR-8 Section 3.2.5 Prohibition of Terms submitted by the Petroleum Marketers Association of America.

NSP urges the immediate withdraw of this item from consideration due to the lack of technical, regulatory or commercial justification for the prohibition of product terms for gasoline with greater than 10% ethanol.

We have seen great success with the current dispenser labeling which meets or exceeds current labeling requirements. Customers are very satisfied with the new "Unleaded 88" offering; further consideration of this prohibition on pump labeling is unwarranted.

Please feel free to contact us if you need further information.

Thanks,

John



John Duff
Strategic Business Director
(806) 749-3478 office
(806) 638-5334 cell
sorghumgrowers.com
Sorghum: The Smart Choice.

