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March 16, 2015

By email to matthew.curran@freshfromflorida.com

Matthew Curran

Florida Department of Agriculture and Consumer Services

3125 Conner Boulevard, Lab 2

Tallahassee, Florida 32399-1650

Re: Alliance Support for NCWM Item 237-3, Diesel Dispenser Filters

Dear Mr. Curran:

The Alliance of Automobile Manufacturers represents 12 manufacturers (listed below) which produce 77% of all new car and light duty vehicles sold in the United States annually.

Our members strongly support proposed changes to National Institute of Standards and Technology (NIST) Handbook 130, Section 4.3 (Item 237-3) to require a 10 micron nominal filter for most diesel fuel pumps (those dispensing greater than 15 gallons per minute [high flow rate] could continue to require use of a 30 micron nominal filter). We also support the comments previously submitted to you by the Truck and Engine Manufacturers Association January 15, 2015.

As noted in the presentation from General Motors at the Fuels and Lubricants Subcommittee during the National Conference on Weights and Measures Interim Meeting January 18, 2015, diesel fuel particulate and water contamination remain common causes of fuel pump, fuel injection, and other equipment problems. Particulates in the form of rust, dirt and debris can lead to pump wear, filter plugging, pump overheating due to a dirty filter, combustion system deposits, and emulsion formation. Even with high quality fuels, some particulate can occur as a result of service station tank aging. Therefore, more effective service station filters are necessary to reduce vehicle hardware issues.

Automakers also encourage minimizing water content, for example by use of coalescence filter media. Water can lead to corrosion, loss of lubricity, increased metal wear, icing, plugged filters or screens, increased degradation of fuel, partial hydrolysis of biodiesel (FAME) in biodiesel blends, and microbiological growth, and can be a solvent/carrier for other contaminants.

Thank you for considering our comments.

Best Regards,

/s/

Valerie Ughetta, Director, Automotive Fuels

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Alliance of Automobile Manufacturers

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