



October 4, 2018

To: National Conference of Weights and Measures
Submitted via email: info@ncwm.net

RE: Opposition to FLR-8 Section 3.2.5. Prohibition of Terms

On behalf of Nebraska's ethanol producers, Renewable Fuels Nebraska is writing to you today to express our strong opposition to the proposal submitted by Petroleum Marketers Association of American that would restrict product terms for gasoline-ethanol blends, specifically FLR-8 Section 3.2.5.

We ask for 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.

The current dispenser labeling meets or exceeds current labeling requirements, and customers are satisfied with the new "Unleaded 88" offering. There is no technical or regulatory justification for this proposal. ASTM test methods include gasoline blended with up to 25% ethanol. This proposed prohibition on pump labeling is unwarranted and should be withdrawn immediately and rejected outright.

Please do not hesitate to contact me at 402-310-8038 or at troyb@renewablefuelsne.org if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Troy Bredenkamp', is placed within a white rectangular box.

Troy Bredenkamp
Executive Director