

November 21, 2018

To: National Conference of Weights and Measures, Northeastern Weights and Measures Association, Southern Weights and Measures Association and Central Weights and Measures Association

Submitted via email: info@ncwm.net

Re: **FLR-8 Prohibition of Terms for Gasoline with greater than 10% by volume ethanol**

We appreciate the opportunity to comment on the proposed changes to Section 3.2.5 from the Petroleum Marketers Association of America (PMAA). We strongly oppose and request withdrawal of this proposal due to the lack of technical justification or a consumer need for this proposal.

Dispensers are labeled according to the Federal Trade Commission (FTC) regulations found in 16CFR306 and the octane posting is accurate for gasoline-ethanol blends up to 25% by volume ethanol content.

More importantly the EPA requires a clearly displayed bright orange E15 label specifically worded to prevent consumer misfueling. We are not aware of any customer complaints or misfueling with E15 since approval for the fuel.

Customers and retailers are pleased with Unleaded 88. The prohibition of the use of the term just not warranted.

Sincerely,

Kelly Davis
VP of Regulatory Affairs