



September 24, 2018

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

cc: Northeastern Weights and Measures Association
Southern Weights and Measures Association
Central Weights and Measures Association

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

As ethanol advocates, we are writing to you today to state 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.

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.

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.