

October 9, 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 the voice of over 26,000 corn producing Hoosier famers, Indiana Corn Growers Association stands on a strong grassroots base of ethanol and renewable fuel advocates. Our association writes today to express our strong opposition to NCWM's proposal to restrict product terms for gasoline-ethanol blends, specifically FLR-8 Section 3.2.5 Prohibition of Terms as submitted by the Petroleum Marketers Association of America.

Ethanol is a tremendous benefactor to the Indiana economy and to rural communities across the nation. With over 46 percent of the annual Indiana corn crop going to ethanol production, any opportunity to prevent or remove regulatory burden from the retail sale of ethanol-blended fuels is an opportunity to inject tremendous value to an ailing farm economy.

President Trump's recent announcement allowing Reid Vapor Pressure parity for ethanol blended fuels up to 15 percent was a strong statement of support for expanded ethanol retail sales. This vote of support for corn growers and ethanol producers across the country should not be met by increased regulatory burden that disallows the branding and labeling that provides the most marketing success for E15 retailers.

With this in mind, 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.

We appreciate the opportunity to comment on this topic. Please feel free to contact us if you need further information.

Sincerely,

A handwritten signature in blue ink that reads "Jane Ade Stevens".

Jane Ade Stevens
Chief Executive Officer,
Indiana Corn Growers Association

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