



October 5, 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 (PMAA).

This proposal by PMAA is a solution looking for a problem. The use of product terms such as "Unleaded 88" have NOT lead to any misfueling events or customer complaints. Neither is there confusion at E15 pumps on what gasoline grade to select- 300,000 fuel transactions and 5 billion miles driven on E15 are evidence that consumers are not confused.

In addition, there are no technical or regulatory justifications for this proposal. Passage of the PMAA proposal would impose facially discriminatory, and anti-fair market treatment on competing vehicle fuels with no scientific basis or justification.

For the reasons set forth above, 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 and without basis.

Please feel free to contact us if you need further information.

A handwritten signature in black ink, appearing to read "Ron C. Seeber". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ron C. Seeber, IOM
President and CEO
Renew Kansas Ethanol Association