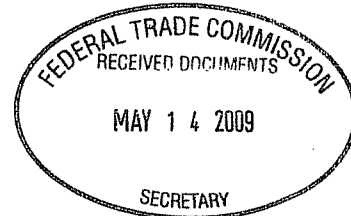


Iowa Renewable Fuels Association

May 1, 2009

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580



RE: Automotive Fuel Ratings, Certification & Posting
16 CFR Ch. 1, Part 306

Dear Commission:

The Iowa Renewable Fuels Association (IRFA) encourages the Federal Trade Commission (FTC) to adopt labeling specifications for E11 – E69 (from 11% up to 69% ethanol-blended fuel) based on the recently implemented biodiesel labeling requirements. Currently, there is no federal labeling guidance for these mid-level ethanol blends which are becoming more available, particularly in the Midwest.

In Iowa, we are experiencing an increase in the number of flex-fuel vehicle purchases. In response to this growing number, retailers are offering more fuel options for flex-fuel vehicle owners in the form of mid-level blends. Iowa retailers are installing blend dispensers that offer blends such as E20, E30 or E50 and E85. Since there are no rules governing the labeling of these mid-level ethanol blends, some retailers are adopting the FTC automotive fuel rating disclosures based on the recent biodiesel labeling requirement. For example, a 30% ethanol blend would be labeled “E30: Minimum 30% Ethanol.”

By focusing on the alternative component, the biodiesel blend labeling is an excellent framework for mid-level ethanol blends in excess of 10% ethanol and below the 70% ethanol threshold for E85. Since many Iowa retailers have already adopted this FTC format for mid-level blends, putting federal guidelines in place that mirror what is voluntarily being used would provide uniformity in pump labeling, consistent consumer information and consumer protection.

The membership of the IRFA strongly encourages the FTC to adopt rules for E11 through E69 ethanol blends using FTC biodiesel labeling requirements as a model.

Sincerely,

Denny Mauser
President