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GrowthEnergy.org

July 25, 2011

Regulatory Review for Alternative Fuels Rule  
16 CFR part 309, Matter No. R311002, Program Code M04

Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex N)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Sir or Madam:

Growth Energy is the leading trade association for America's ethanol producers and supporters. Growth Energy promotes expanding the use of ethanol in gasoline, decreasing our dependence on foreign oil, and creating American jobs here at home.

With ethanol representing nearly ten percent of the nation's fuel supply, we have a significant interest in the labeling of alternative fuels and alternative fuel vehicles and are pleased to submit these brief comments regarding the Federal Trade Commission's Regulatory Review for the Alternative Fuels Rule (16 CFR part 309, Matter No. R311002, Program Code M04).

Specifically regarding flex fuel vehicle labels for ethanol blends up to E85, the FTC has specifically asked for comment about consolidating its Alternative Fuel Vehicle labels with EPA/NHTSA fuel economy labels. Since EPA and NHTSA have finalized their fuel economy labels for the 2013 model year, we believe that it makes sense to consolidate the FTC's AFV label with these finalized labels. The finalized labels address all of the key issues of importance to the consumer in the areas of fuel economy, fuel cost, smog and greenhouse gas ratings. Additionally, the labels point consumers to the <http://fueleconomy.gov> webpage where they can easily compare alternative fuel vehicles across the spectrum. As such, we support and agree with your statement: "Consolidating the FTC and EPA labels would benefit consumers and industry by eliminating potential confusion caused by duplicative and possibly inconsistent labels, and reducing the burden on manufacturers to create and post two labels."

We appreciate your consideration of our comments and your attempt to streamline the labeling process for flex-fuel vehicles. By using the fuel economy labels in lieu of the FTC label, you are making it easier for

consumers to choose vehicles that decrease our dependence on foreign oil and to use home-grown, American ethanol

Sincerely,



Tom Buis  
CEO, Growth Energy