

April 19, 2014

Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue, NW, Room CC-5610 (Annex N)  
Washington, DC 20580

RE: 16 CFR Part 306; Automotive Fuel Ratings, Certification and Posting; Project No. R811005

To Whom It May Concern:

Arguments opposed to H.R. 1462 extol the financial benefits to farmers which result from higher corn prices. But at who's expense? This money comes from everyone who eats. ...not just those who eat corn but also all of the people who eat the live stock which rely on corn for feed. Farmers will pay more for feed which will increase the cost of beef, pork, and chicken. When many US citizens are at, or below, the poverty level, enriching corn farmers by increasing the burden on these struggling citizens is, in my opinion, immoral. Furthermore, the energy consumed creating alcohol from corn is not free nor does it come without emissions. The energy provided by burning the alcohol product (with yet more emissions) is less than the energy used to create the alcohol from the corn. Even if the corn were FREE (and it is not, remember the argument for the benefit to the corn farmers) this represents a net loss. Finally, alcohol absorbs water from the atmosphere. Internal combustion engines have not been designed to ingest water. The rubber in automotive fuel systems deteriorates when carrying water. The least dangerous result would be an expensive repair. But, in the event of a fuel leak in the presence of an ignition source, the result could easily be loss of life and property.

As a member of the American Motorcyclist Association or other riding group, I am writing to express my concerns about the Federal Trade Commission's proposed rule to provide requirements for rating and certifying ethanol blends and requirements for labeling blends of more than 10 percent ethanol.

This rule is for an additional label to be placed on the fuel pump "in response to the emergence of ethanol blends as a retail fuel and the likely increased availability of such blends."

This proposal would cause even more confusion given the events surrounding the rollout of E15 into the marketplace. The AMA opposes E15 and any fuel containing more than 10 percent ethanol, because it can cause engine and fuel system failure on motorcycles or all-terrain vehicles, and can void manufacturers' warranties.

According to the EPA, "[e]thanol impacts motor vehicles in two primary ways. First ... ethanol enleans the [air/fuel] ratio (increases the proportion of oxygen relative to hydrocarbons) which can lead to increased exhaust gas temperatures and potentially increase incremental deterioration of emission control hardware and performance over time, possibly causing catalyst failure. Second, ethanol can cause materials compatibility issues, which may lead to other component failures."

"In motorcycles and nonroad products [using E15 and higher ethanol blends], EPA raised engine-failure concerns from overheating."

I do not believe this new label will do what it is intended to do – keep users from inadvertent misfueling with higher ethanol blended fuels. It simply does not provide clear direction.

Another label on a blender pump that already has many labels will not be sufficient to avoid misfueling and could be easily overlooked. The proposed rule provides no direction on where on the pump the label should be located. Moreover, the FTC is proposing that the label be rounded to the nearest 10. How will this accurately inform the consumer of the type of fuel called for by the vehicle owner's manual? Will a fuel containing 11 percent to 14 percent ethanol be labeled as 10 percent ethanol? Is the FTC aware that manufacturers' warranties are valid only for the use of fuel containing 10 percent ethanol by volume or less?

The proposed rule does not address the central issue that real-world motorcyclists face, and that is that no motorcycle currently on the road is approved for any fuel with higher than 10 percent ethanol, and the risk of inadvertent misfueling is tremendous once higher blends are available at the pump.

Help protect 22 million motorcycles and all-terrain vehicles in America -- and the riders who depend on their safe operation -- from inadvertent misfueling. All we want is safe access to fuel for our motorcycles and ATVs.

Thank you for your time and opportunity to comment on this important issue.

Sincerely,  
T H Williamson, CA