

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:

The U.S. Environmental Protection Agency has publicly acknowledged that ethanol in gasoline can damage internal combustion engines by increasing exhaust temperatures and indirectly causing component failures.

Yet, even with this knowledge, the Federal Trade Commission is recommending more labeling at the gas pump as its solution to the problem.

The American Motorcyclist Association believes that is not enough.

The Federal Trade Commission issued a rule proposal to provide requirements for rating and certifying ethanol blends and requirements for labeling blends of more than 10 percent ethanol.

But this rule exempts the U.S. Environmental Protection Agency's E15-approved label.

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."

With this rule, it only means gasoline with higher blends of ethanol will emerge into the marketplace.

The AMA believes this proposal will 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 ten percent ethanol because it can cause engine and fuel system failure to your motorcycle or all-terrain vehicle, 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."

The FTC is seeking public comments now on the rule proposal that calls for the additional label to identify higher ethanol blended fuels. You can tell the agency how this proposal will cause even more confusion, given the events surrounding the rollout of E15 into the marketplace.

The AMA does not believe this new label will do what it is intended to do – keep users from 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 factor of 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?

Help protect 22 million motorcycles and all-terrain vehicles in America -- and the riders who depend on their safe operation -- from inadvertent misfueling. Tell the FTC you want safe access to fuel for motorcycles and ATVs!

The loser in any inadvertent misfueling event is the motorcyclist and ATV rider. The AMA stands behind its members, and all riders, in calling for more thorough safeguards against misfueling.

The deadline for comments is Jun. 2! Act today to ensure your voice is heard. To submit comments, please copy the prewritten comments below. Then go to <https://ftcpublic.commentworks.com/ftc/autofuelratingscertnprm/>. Once you are on the site, paste the prewritten comments in the 'Comments' field box. Before submitting, please complete the rest of the fields.

For the latest information on the AMA's efforts to protect your access to safe fuel, go to <http://www.americanmotorcyclist.com/rights/amafuelforthought.aspx>.

Now more than ever, it is crucial that you and your riding friends become members of the AMA to help protect our riding freedoms. More members mean more clout against the opponents of motorcycling and ATV riding. That support will help fight for your rights – on the road, trail, racetrack, and in the halls of government. If you are a motorcycle rider, join the AMA at [AmericanMotorcyclist.com/membership/join](http://AmericanMotorcyclist.com/membership/join).

If you have any questions regarding this alert, please contact the AMA grassroots coordinator by completing the form below.

#### Prewritten Comments:

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,  
Thomas Baldwin, VT