

April 20, 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:

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.

Additionally, use of E15 (or higher) ethanol blended fuels in a blender pump dispense system (one pump for all grades of gasoline) is hazardous for the health of any engine that is not authorized to use the higher ethanol-blend fuels, due to the residual levels of E15 that can occur. The EPA's original response for dealing with that potential situation was to advise motorist's to be sure that they are filling their tanks with more than 4 gallons of fuel to dilute the E15. On my motorcycles, to fill with more than 4 gallons of gas at one time means that I would have to partially fill the gas tank, and then dump that gas out, as the maximum fill is narrowly close to that 4 gallon minimum. This is not an acceptable solution by anyone's standards of operation, which only highlights the negative results of even having E15 available in a

blender system at all. E15 fuels need to be kept fully separate fro any other fuel options, in clearly marked dispensing pumps, if they are to be used at all (as the value of converting corn stock into automotive fuel is a questionable environmental strategy at best, and seems to be only a financial benefit to those who can grow corn on an enormous scale).

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

Sincerely,
JOSEPH NESSELROTH, CO