

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

May 6, 2014

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

To Whom It May Concern,

A label stuck somewhere on a gas pump is not going to be notification enough of the misfueling issue, as most gas pumps already have a myriad of stickers, signs, etc. all over them, many for advertising purposes. It will be easily overlooked, as most people are so inundated with the stickers already present that they most likely won't even notice.

When unleaded fuel was introduced into the market, the nozzles were designed so that misfueling was impossible for unleaded cars, but it didn't prevent fueling older cars with unleaded fuel. Anyone who was around at that time remembers the very expensive damage that unleaded fuel did to engines designed to run on leaded fuel, the repairs usually ran from around a thousand dollars for a valve job with new valve seats to around \$2000 or more for engines that also suffered piston and ring damage.

The studies that were done by various government agencies at the time said that there wouldn't be any damage from misfueling, and they were wrong. The loser was the consumer.

When California went to low sulfur Diesel fuel, once again studies were done by the various government agencies, and those studies found no damage to the older vehicles using the new fuel, and once again, they were wrong, with injector pumps needing to be rebuilt due to fuel incompatibilities with the seals in the pumps. Again, the consumers were the losers, this time to the tune of \$800-\$2500 on average to have their injector pumps repaired or replaced.

Now we have yet another reformulation of fuel, and the EPA's position started out that no damage could occur due to misfueling. Now, after being bombarded with documented information to the contrary, much of which comes from the vehicle manufacturers themselves, they reverse their position that engine damage will occur to earlier vehicles, and their proposed solution is a sticker? Who will be the loser this time if the plan is implemented? Once again, the consumer, the very people who are supposed to be protected.

I'm reminded of George Santayana's quote; "Those who cannot remember the past are condemned to repeat it." Let's stop hosing the consumer based on the whims of the environmentalists and various lobbyist groups in Washington. Enough is enough.

Sincerely,  
William Richter, CA