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GrowthEnergy.org

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW
Washington, DC 20580

Fuel Rating Rule Review, 16 CFR Part 306, Project No. R811005

To Whom It May Concern:

Growth Energy is a leading association of ethanol producers, associates, and supporters. Today's ethanol industry accounts for nearly 400,000 American jobs and more than \$40 billion to the nation's economy. We promote expanding the use of ethanol in gasoline, decreasing our dependence on foreign oil, improving our environment and creating American jobs. Ethanol is a home-grown, renewable fuel that provides significant benefits to our nation's transportation system. Ethanol is nearly 10 percent of our nation's transportation fuel supply and is poised to grow even more.

As you know, we provided very substantive comments on the 2010 NPRM that cover these important issues and also had the chance to discuss further in a meeting with FTC staff in 2011. We appreciate this opportunity to provide additional input here.

As the nation moves forward with the success of the Renewable Fuel Standard, higher ethanol blends will continue to increase in the marketplace and so clear and effective labeling for ethanol blends will be essential.

We appreciate the Commission working with EPA to exempt E15 from this rule as E15 currently has an effective label in place that correctly identifies the vehicles for which it is approved.

On other ethanol blend labeling, while we appreciate the Commission's efforts, we continue to have concern about the latest label iteration. Specifically, we continue to believe that the Commission has not shown a record or data to suggest that the statement "May Harm Other Engines" should be included. Further, we believe the statement is vague, does nothing to prevent misfueling, and only further confuses the consumer. We believe that using the statement "Flex Fuel Vehicles Only" directly addresses misfueling and further, if the Commission finds a need for additional wording, we again would suggest "Not Approved for Other Engines" instead or adding "Attention" to further reach consumers.

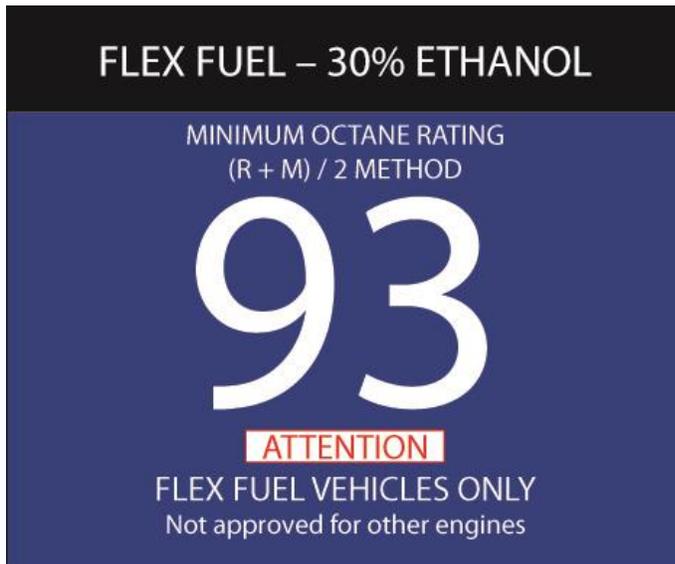
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Additionally, Growth Energy has continually asked the Commission to include an octane rating for ethanol blends. Ethanol is a high octane fuel and consumers deserve to know the octane ratings of these ethanol blends, so that if they have a Flex Fuel vehicle, they can make a fuel choice based on the fuel's price and performance which includes its octane rating.

We have included a suggested label here (below) based on our current and previous comments:



Thank you in advance for your consideration of these and our previous comments. If you have further questions, please contact me or Chris Biley, Growth Energy's Director of Regulatory Affairs.

Sincerely,

Tom Buis
CEO, Growth Energy