

To: Federal Trade Commission

From: Petroleum Marketers and Convenience Stores of Iowa

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

Date: June 30, 2014

The Petroleum Marketers and Convenience Stores of Iowa (PMCI) is a private not-for-profit state trade association representing independent fuel wholesalers, retailers, transporters, travel plazas, car washes and convenience stores throughout the state of Iowa. While many of our members may display the logo of their supplier, they are owned and operated independent of any major oil company. Since 1937, PMCI has existed to encourage a competitive business climate that will promote growth of the independent fuel marketing industry within the state.

Iowa retailers are heavily invested in the promotion and sale of ethanol blended gasoline. Currently, approximately 206 locations within the state are retailing E85 and a majority of these sites are also offering mid-level ethanol blends through the use of a blender dispenser.

PMCI supports the Commission's proposed amendment requiring labels for ethanol blends (excluding registered E15) to state "USE ONLY IN FLEX-FUEL VEHICLES/ MAY HARM OTHER ENGINES", and would ask that the Commission consider additional language to be added to the label. Ultimately it is the dual responsibility of the consumer and the retailer to insure that the product dispensed is approved for use in the vehicle that will ultimately consume it.

By last count, approximately 7% of Iowa's vehicle fleet was deemed flex-fuel compatible. Until the saturation of flex fuel vehicles sees a dramatic increase, this type of label is necessary to protect consumers and retailers alike from incidents of misfueling and the potential harm that comes with it. Although there is no perfect means to prevent misfueling incidents, the language proposed in this rulemaking places the uncertain consumer on alert before fueling their vehicle with the product bearing the label. With that in mind, PMCI would ask that the Commission give consideration to expanding the language on the label to include "USE ONLY IN FLEX-FUEL VEHICLES / MAY HARM OTHER ENGINES / CONSULT VEHICLE OWNER'S MANUAL FOR FUEL RECOMMENDATIONS." With the addition of the language above, consumers are not only placed on alert that the product before them is intended for a specific type of vehicle, but are also provided with an immediate means to determine whether the product is suitable for use in their vehicle.

PMCI also supports the Commission's proposed ethanol content disclosure requirement involving rounding ethanol percentages to the nearest factor of 10, but would ask that the Commission clarify the acceptability of continuing to label the exact percentage of ethanol in the ethanol gasoline blend assuming the rounding method is approved.

We appreciate the opportunity to provide comment on the Commission's proposed rule. If there are any questions regarding these comments please contact me at your convenience.

Sincerely,

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