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Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue NW.  
Suite CC-5610 (Annex B)  
Washington, D.C. 20580

**Growth Energy Comments**  
FUEL ECONOMY GUIDE AMENDMENTS, R711008  
81 Federal Register 36,216 (June 6, 2016)

Growth Energy appreciates this opportunity to submit brief comments on the Federal Trade Commission's proposed amendments to the Guide Concerning Fuel Economy Advertising for New Automobiles (the "Proposed Amendments"). Growth Energy is the leading association of ethanol producers in the country, with 85 plant members and 96 associate members who serve our Nation's need for renewable fuel. Growth Energy is a strong supporter of national strategies to promote the use of renewable fuel and to improve the efficiency of domestic biorefineries. Flex fuel vehicles ("FFVs") that run on biofuels, like ethanol, are cleaner burning and reduce harmful emissions that have been linked to cancer and smog.

*First*, Growth Energy would like to confirm that the Proposed Amendments do not apply to or implicate any changes to the Environmental Protection Agency's ("EPA") vehicle fuel economy labels. It is Growth Energy's understanding that the Proposed Amendments do not require any modifications to the EPA fuel economy label, and, generally, that vehicle sticker labeling is not within the scope of the Proposed Amendments. Rather, with respect to FFVs, the Proposed Amendments would only require disclosure of the EPA-estimated FFV mile-per-gallon rating if an advertisement (a) makes a claim regarding a vehicle's flex-fuel capability, and (b) makes a claim regarding fuel economy. 81 Fed. Reg. at 36,227.

*Second*, relevant to FFVs, Growth Energy would like to confirm that the Proposed Amendments are not intended to in any way limit truthful and substantiated statements an advertiser may make regarding the benefits of FFVs, including that they can run on cleaner burning ethanol blends and that there may be cost-savings associated with alternative fuels.

We appreciate this opportunity to comment on the Proposed Amendments. Thank you in advance for your consideration of our comments.

Sincerely,

Christopher P. Bliley  
Director, Regulatory Affairs