



January 25, 2020

Mr. Craig Van Buren, Chair
National Conference of Weights and Measures

Mr. Ethan Bogren, Chair
Laws & Regulations Committee
National Conference of Weights and Measures

Mr. Bill Striejewski, Chair
Fuels and Lubricants Subcommittee
National Conference of Weights and Measures

Dear Mr. Van Buren, Mr. Bogren and Mr. Striejewski:

I am writing to you to express PMAA's support for the API proposals related to product transfer documentation, ethanol flex fuel, and Gasoline blends (B4: MOS-20.2, B4:FLR020.3, and FLR-20-2). It is important for me to point out that PMAA does not oppose ethanol blends or renewable fuels. Our comments and proposals regarding ethanol blends, as well as our support of the API proposals, are driven by a desire to ensure transparency in its blending, the quality of the product being sold, and fairness in its marketing. The purpose of the Handbook 130 is, among other things, to "...permit fair competition among business and provide uniform and sufficient protection to all consumers in commercial weights and measures practices." We believe that this is the purpose of API's proposals and find it difficult to understand why there is such strong opposition to the consideration of proposals that would require transparency in the product being purchased and delivered to a marketer.

Ethanol blends can be subject to abuse by the use of inappropriate blend stocks or misstated volume of ethanol in the products used for blending. Quality blend products and proper blend ratios are important considerations for E15 to be successful in the marketplace. For marketers that blend E15 from E85 and E10, it is essential that the actual ethanol percentage received for each load of E85 be disclosed in order to adjust blending dispensers accordingly to blend a proper E15 fuel. PMAA's marketers who blend E15 want a level playing field which means certified blend stocks and true ethanol content disclosures. What is proposed by API goes a long way towards ensuring that E15 meets these standards.

Finally, it is important to note that three of the four regions recommended that these proposals be assigned to FALS for further consideration. The fact that there has been some discussion of these proposals during recent FALS conference calls is not a reason to disregard these proposals.

If you have any questions, please feel free to reach out to me at runderwood@pmaa.org

Sincerely,

A handwritten signature in black ink that reads 'Rob Underwood'. The signature is written in a cursive style with a long, sweeping underline.

Rob Underwood
PMAA President