



January 17, 2020

Mr. Doug Musick
Manager, Weights and Measures Program
Kansas Department of Agriculture
1320 Research Park Drive
Manhattan, KS 66502

Dear Mr. Musick,

We write to ensure you are aware of our opposition to the proposals (FAL 20.2 and FAL 20.3) that were submitted to the National Conference on Weights and Measures. Our organization is extending significant resources to expand ethanol market share in support of U.S. agriculture who just experienced one of the worst growing seasons in history.

Ethanol is a high quality, consistent component in gasoline that must adhere to strict fuel quality specifications. At a time of significant motor fuel consumption, nearly every gallon of gasoline in the United States contains a minimum of 10% ethanol and 15% ethanol blends are gaining market share. Consumers have now driven more than 8 billion miles on 15% ethanol blends and retailers have conducted millions of transactions.

These proposals are duplicative and unnecessary. They create a dual regulatory authority (state/federal), placing additional burden on state government personnel with no technical justification. It is our preference that state level officials not duplicate the efforts of Federal Agencies. U.S. EPA already has a robust compliance program in place for E15, including misfueling mitigation and a required sampling program to ensure proper blending and labeling.

These proposals are without merit. We urge you to oppose these proposals by identifying these items to be "withdrawn" from consideration at the National Conference of Weights and Measures Interim Meeting at the upcoming meeting the week of January 27th, 2020.

Thank you for your consideration. Please feel free to contact us with questions or comments.

Respectfully,

A handwritten signature in blue ink, appearing to read "Ron Seeber", with a long horizontal flourish extending to the right.

Ron Seeber, President and CEO
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cc: Don Onwiler, Executive Director, National Conference on Weights and Measures
Via email: don.onwiler@ncwm.com
Craig Van Buren, Chair, National Conference on Weights and Measures
Via email: vanburenc9@michigan.gov