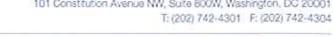
American Motorcyclist.com





April 3, 2013

The Honorable Fred Upton Chairman Committee on Energy and Commerce 2125 Rayburn House Office Building Washington, DC 20515

The Honorable Henry Waxman Ranking Member Committee on Energy and Commerce 2322A Rayburn House Office Building Washington, DC 20515

Dear Chairman and Ranking Member:

The American Motorcyclist Association appreciates the opportunity to respond to relevant questions from the Renewable Fuel Standard Assessment White Paper.

Per your request, please see the AMA's responses to the following questions:

2. What are the benefits and risks of expanded use of E15 to automakers, other gasoline powered equipment makers, refiners, fuel retailers, and others involved in the manufacture and sale of gasoline and gasoline-using equipment?

AMA response:

The EPA's decision to allow E15 into the marketplace will impact every American who owns a car, lawnmower, boat, snowmobile, motorcycle or all-terrain vehicle. Manufacturers have stated that use of E15 may void warranties. In off-road engines, the effects can even be dangerous for users.

With the EPA using only one test to determine if E15 is safe for vehicles before granting a waiver, the AMA urges the agency to allow for an independent scientific study by the National Academy of Sciences to occur. We also request that motorcycles and ATVs be included in such study.

3. What are the risks of the introduction and sale of E15 to the owners of pre-2001 motor vehicles, boats, motorcycles, and other gasoline-powered equipment not approved to use it? Are there risks to owners of post-2001 vehicles? How do these risks compare to the benefits of the RFS?

AMA response:

In October 2010, the EPA approved the use of E15 in model year 2007 and newer light-duty vehicles (cars, light-duty trucks and medium-duty passenger vehicles). Then, in January 2011, the EPA added model year 2001-2006 light-duty vehicles to the approved list.

No motorcycles or ATVs are currently on the list.

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The AMA has expressed concerns about E15 being mistakenly used and damaging engines in motorcycles and ATVs, and about the continued availability of gasoline that has no ethanol, or gasoline with only a 10 percent blend, that is safe for use in motorcycles and ATVs.

7. Is E15 misfueling unavoidable? Are there lessons from the labeling and dispensing of diesel, E85 and other fuels that prevent their misfueling that can also be applied to E15? What specific actions are companies taking to address potential misfueling concerns under MMPs?

AMA response:

On Feb. 7, the EPA posted a new option for retailers on its website's "E15: Misfueling Mitigation Plans" page to try to avoid misfueling by consumers.

Under the new option, retailers who use a blender pump to sell E15 and E10 fuel through the same hose must also have a separate E10/E0 fuel pump. Those retailers would be required to have a label on the blender pump that reads: "Passenger Vehicles Only. Use in Other Vehicles, Engines and Equipment May Violate Federal Law." Retailers would also be required to have signs indicating the location of the dedicated E10-or-lower fuel pump. There would be no minimum-fuel-purchase requirement at that pump.

The AMA can only imagine how many motorists and motorcyclists will be lining up at that single pump to get E10-or-lower fuel.

Furthermore, a survey by the National Marine Manufacturers Association found 35 percent of the retailers in non-compliance with the current labeling requirements. The AMA believes that enforcement will be more difficult with sequestration.

The AMA does not believe this new misfueling mitigation plan will provide clarity to our members and the general public. Another label on a blender pump that already has many labels will not suffice and could be easily overlooked. The plan calls for no physical barriers in the fueling nozzle/receptacle as was provided for when the nation went from leaded to unleaded fuel. History tells us that, even with these physical barriers in place, misfueling still occurred.

Retailers who want to sell E15 also have the option of having a dedicated E15 pump or hose, or a pump that dispenses E15 and higher ethanol blends through a single hose. If a blender pump dispenses multiple fuels that include E15 and higher ethanol blends, the EPA may require a minimum purchase requirement.

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Last year, the AMA told the EPA that with E15 now coming into the market, our members who make a concerted effort to fuel their motorcycles or ATVs with E10-or-less fuel, may unknowingly refuel with residual E15 left in a blender-pump hose. A blender pump dispenses different fuel blends through the same hose, such as E10 and E15. When a customer buys E15, as much as a third of a gallon of residual E15 is left in the hose, which can inadvertently get into the next customer's vehicle while fueling with E10.

The EPA said: "In an effort to address this potential misfueling issue, EPA approved an industrysubmitted [approach] that requires a minimum purchase of four gallons from blender pumps that dispense both E10 and E15 from the same hose and nozzle. Such an approach would prevent misfueling by diluting any residual E15 left in the hose from the previous sale of E15."

However, the AMA objected to this misfueling mitigation plan because our members' fuel tanks' capacities are normally two-to-three gallons on average.

Again, thank you for the opportunity to answer questions from the Renewable Fuel Standard Assessment White Paper. If you have any questions, please do not hesitate to contact me by phone, (202) 742-4301, or by email, wallard@ama-cycle.org.

Sincerely,

Wayne Allard

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Vice President, Government Relations