



July 22, 2013

The Honorable Ed Whitfield
Chairman
Subcommittee on Energy
and Power
2125 Rayburn HOB
Washington, DC 20515

The Honorable Bobby Rush
Ranking Member
Subcommittee on Energy
and Power
2322A Rayburn HOB
Washington, DC 20515

Dear Chairman Whitfield and Ranking Member Rush:

The American Motorcyclist Association applauds the U.S. House Subcommittee on Energy and Power of the Committee on Energy and Commerce for holding the hearing entitled "Overview of the Renewable Fuel Standard: Stakeholder Perspectives."

Founded in 1924, the AMA is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

In October 2010, the U.S. Environmental Protection Agency approved the use of E15, a blended fuel that includes up to 15 percent ethanol by volume, 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.

None of the estimated 22 million motorcycles or ATVs currently in operation is on the list.

The AMA has repeatedly expressed concerns about E15 being mistakenly used and possibly 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, for use in these 22 million motorcycles and ATVs.

Moreover, the EPA used only one test to determine if E15 is safe for vehicles before granting a waiver. The AMA has urged the agency to allow for an independent scientific study by the National Academy of Sciences into the effects of E15 on vehicles. We also request that motorcycles and ATVs be included in such a study.

With E15 available in the marketplace, inadvertent misfueling may readily occur. Even now, studies show that the majority of motorists do not know the difference between E10 and regular gasoline. The problem is potentially worse with E15. Additionally, a National Marine Manufacturers Association study has shown that mislabeling is already occurring where E15 is sold, which may lead to inadvertent misfueling.

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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 motorcyclists and motorists will be lining up at that single pump to get E10-or-lower fuel.

In fact, boosters of the untested E15 ethanol blend insist that the EPA "has seen to it that E15 is clearly labeled at fueling stations."

However, fueling stations selling E15 are not abiding by the current EPA label requirement. One example is visible in the attached photograph taken July 6, 2013, in Platteville, Wis., at a Smart Station retailer. The Smart Station E15 label differs from the approved EPA language. How will motorcyclists know this fuel is unsafe for their motorcycles? Furthermore, the placement of the E15 hose adjacent to the visually identical 89 octane hose is some distance from the E15 label.

If a retailer does not accurately and clearly label the E15 fuel hose, a motorcyclist – or motorist - - may inadvertently use it, believing it is an E10 or E0 blend.

Therefore, the AMA does not believe this new misfueling mitigation plan will do what it is intended to do – keep users from misfueling with E15. It simply does not provide clear direction. Another label on a blender pump that already has many labels will not suffice to avoid misfueling and could be easily overlooked. The misfueling mitigation 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.

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.

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The EPA said: "In an effort to address this potential misfueling issue, EPA approved an industry-submitted [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."

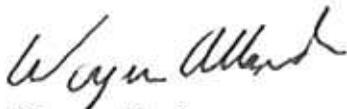
However, the AMA objected to this misfueling mitigation plan because our members' street bike fuel tanks are small, holding roughly three to six gallons. Off-highway motorcycles typically have even smaller gas tanks.

The AMA wants access to safe fuels for motorcycles and ATVs. Given marketplace realities, wherever E15 is sold there will very likely be inadvertent misfueling issues. Motorcycles and ATVs are not approved for E15 use, and inadvertently misfueling a motorcycle or ATV has the potential to not only damage the machine but also to void a manufacturer's warranty.

The loser of any inadvertent misfueling is the motorcyclist and ATV rider. The AMA stands behind not only its members, but all riders, in calling for more extensive testing for E15 and more thorough misfueling safeguards.

Again, the AMA thanks you and the subcommittee for holding the hearing on the RFS.

Sincerely,



Wayne Allard
Vice President, Government Relations