



Monday, November 18, 2019

Acting Assistant Administrator Anne Idsal
Office of Air and Radiation
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Assistant Administrator Idsal:

I am writing on behalf of the Renewable Fuels Association (RFA) in support of the Auto Alliance's September 3, 2019 letter urging EPA to issue a new guidance letter to implement a F-factor for MY 2020 and beyond. As indicated in our letter to Byron Bunker on August 30, we believe EPA should review data previously provided to the Agency demonstrating that a far more meaningful F-factor is justified and move more expeditiously to produce guidance for future model year vehicles. Though we appreciate the guidance provided in August for EPA's F-factor for model year 2019 flexible fuel vehicles (FFVs), it is important for EPA to issue a new guidance letter providing long-term certainty and a more realistic F-factor.

On behalf of the nation's ethanol producers, RFA supports the auto industry in its request for an updated F-factor of 0.21 for model years 2020 and beyond, which automakers need to continue producing FFVs. Timely and accurate F-factor guidance provides a meaningful incentive for auto manufacturers to increase their FFV production. In the absence of most up-to-date guidance from EPA, automakers are reluctant to invest in FFV production which in turn, impacts market opportunities for higher-blends of renewable fuels. Therefore, it essential that EPA act as quickly as possible to issue F-factor guidance for future model years.

FFVs are capable of operating on fuel blends containing up to 85 percent ethanol (E85) and use a cleaner, higher octane fuel source. Moving more expeditiously on guidance for future model year vehicles will encourage investment in high octane low carbon vehicle technologies which will enable high-efficiency engines with high compression ratios that capture ethanol's octane additive value. The President has repeatedly expressed his support for expanding the market for renewable fuels. By releasing guidance, EPA will send a positive market signal to all stakeholders while simultaneously achieving one of President Trump's stated policy goals.

RFA is fully committed to collaborating with EPA and other industry stakeholders to bring more efficient transportation solutions of the future. EPA's establishment of an updated F-factor of 0.21 for MY 2020 and future model year vehicles would benefit farmers, renewable fuel producers, marketers and automakers alike. We appreciate your consideration of this request and look forward to working with you.

Sincerely,

A handwritten signature in black ink that reads "Geoff Cooper". The signature is written in a cursive, flowing style.

Geoff Cooper
President and Chief Executive Officer