

Fuel Rating Rule, PRA Comment, R811005

Docket ID: FTC-2026-0991

Automotive Fuel Ratings, Certification and Posting

I am submitting this comment as an individual consumer. I support extending the recordkeeping and disclosure requirements under the FTC's Automotive Fuel Ratings, Certification and Posting Rule.

Accurate and visible fuel-rating labels allow consumers to compare products, select the appropriate fuel for their vehicles, and understand what they are purchasing before paying. Incorrect, missing, damaged, or misleading labels can cause consumers to purchase the wrong fuel, pay more than expected, or risk damage to their vehicles.

The certification and recordkeeping requirements are necessary because posted ratings should be supported by reliable documentation throughout the supply chain. Refiners, producers, importers, distributors, and retailers should retain delivery tickets, certifications, and testing records showing how each fuel rating was determined. Without these records, it would be difficult for regulators to investigate inaccurate labels or determine where incorrect information entered the distribution process.

I ask the FTC to extend these requirements and strengthen the quality and clarity of the information provided to consumers. Fuel labels should be:

1. Clearly visible before the consumer selects the fuel.
2. Printed in large, readable text with adequate color contrast.
3. Placed consistently on each dispenser.
4. Resistant to weather, fading, tampering, and ordinary wear.
5. Replaced promptly when damaged, missing, or unreadable.
6. Written in plain language and consistent across retailers.
7. Clear about the fuel type, octane rating, and any important blend information.
8. Accessible to consumers with disabilities and people who have difficulty reading small print.

Retailers should also have a straightforward process for consumers to report missing or inaccurate labels. Complaints should identify the station, dispenser, fuel type, date, and nature of the suspected problem without requiring consumers to provide unnecessary personal information.

The FTC estimates five minutes per year for each covered industry member to ensure retention of relevant records and approximately one hour to produce, distribute, and post labels when replacement is required. The FTC should confirm these estimates using information from businesses of different sizes. The assumption that labels last an average of eight years should also be reviewed because weather exposure, cleaning chemicals, vandalism, equipment changes, and fading may require more frequent replacement.

The administrative burden can be minimized by allowing standardized electronic records, digital delivery tickets, reusable certification templates, and secure record-storage systems. However, digital records should not replace the physical label that consumers need to see at the dispenser. Any electronic option should be compatible with FTC inspections and preserve reliable dates and sources.

The FTC should conduct periodic compliance checks and take appropriate action when businesses knowingly post inaccurate ratings, fail to maintain supporting records, or leave labels missing or unreadable. Honest businesses and consumers are both harmed when competitors avoid these basic requirements.

The Fuel Rating Rule provides useful information at a relatively modest cost. I urge the FTC to extend the information-collection requirements while continuing to improve label visibility, consistency, accessibility, record accuracy, and enforcement.

Thank you for considering my comment.