



February 23, 2007

Honorable Robert Herkes
Chairman, House Consumer Protection & Commerce Committee
Hawaii State Capitol, Room 320
415 South Beretania Street
Honolulu, HI 96813

Dear Representative Herkes;

Reference: House Bill 791; Gasoline Dealers; Ethanol

EAA (Experimental Aircraft Association) is the world leader in recreational aviation. With an international membership of 170,000, of which 1,100 reside in the State of Hawaii, EAA brings together aviation enthusiasts, pilots and aircraft owners who are dedicated to the continued growth of aviation, the preservation of its history and a commitment to aviation's future. EAA programs, activities and events are known throughout the world for *Preserving* the heritage of aviation, *Promoting* access to flight, *Protecting* the right to fly, *Preparing* the future of aviation, and of our *Passion* for aviation safety and education.

As the world leader in recreational aviation, we are well aware of the public safety ramifications ethanol-blended gasoline fuels present to the ultimate users of this product – the citizens you serve. We applaud the State of Hawaii for recognizing the impact ethanol-blended gasoline is and will continue to have on marine engines and other small gasoline-driven tools.

At the same time, we are writing to express our grave concern that House Bill 791 will overlook other recreational vehicles that utilize small engines that are suffering the same operational hazardous as marine vehicles.

The Federal Aviation Administration (FAA) and EAA began testing and evaluating alternate fuels for aircraft piston engines in 1964. These tests included not only automobile gasoline but also ethanol. In 1982, as a direct result of these and other on-going studies, the FAA issued the first Supplemental Type Certificate (STC) that allowed the use of automobile gasoline rather than aviation gasoline in recreational and general aviation aircraft. These early studies clearly indicated that ethanol-blended gasoline is a safety hazard to any aircraft engine, including 2-stroke engines used in ultralight vehicles, that uses this product. This fact was recently reinforced when the FAA published Special Airworthiness Information Bulletin (SAIB) No. CE-07-07, on October 27, 2006, in which the FAA outlines the clear and present danger imposed to aircraft engines when using ethanol-blended gasoline. This FAA SAIB is attached for use as a reference tool for yourself and the CPC committee.

EAA has worked with several states on wording of similar bills, including Montana (SB 293, signed into law on April 28, 2006) and Missouri (HB 1270, signed into law on May 26, 2006), and would like to offer the following alternative language for HB 791:

“§486H – Provision of gasoline not containing ethanol. Each refiner, as that term is defined in section 486J-1, shall make available to marine and airport fueling stations, and its company-operated stations that are owned and operated by the refiner unleaded premium grade gasoline with an antiknock index number of 91 or greater that does not contain the ethanol content required by section 486J-10.”

The proposed wording will allow all citizens of Hawaii to continue to enjoy their recreational and commercial activities in a safe manner. We urge you to adopt this recommended change.

On behalf of the owners of piston powered recreational/general aviation aircraft, and ultralight vehicles that fly in the skies over Hawaii daily, EAA appreciates this opportunity to express the safety concerns of this association and of our 1,100+ members living in your great state.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy", written in a cursive style.

Randy Hansen
Government Relations Director
Experimental Aircraft Association

cc: Members, House Consumer Protection & Commerce Committee