

<< 0041011 >>

Comment 1,011

8-27-03

Dear Sir or Madam:

Chief, Regulations and Procedures Division
Tax and Trade Bureau
PO Box 50221
Washington, D.C. 20031-0221

RE: TTB Notice #4
Dear Sir or Madam:

Support of TTB Notice #4 is essential to the beverage industry in delineating differences between beer and other alcoholic beverages; requiring that alcohol content in distilled alcohol - derived FMB's not exceed 0.50/o in order to be classified as "beer."

We are one of more than 1,400 brewers, whose primary charge is to maintain the integrity of our beverages through our commitment to processes and beer styles representative of hundreds of years of evolution.

As a result we, as well as other small businesses have extensive investments and interests in the production of traditional malted beverages.

Breweries are seeking to even out the playing field for all beverage manufacturers: traditionalists and those claiming to produce beer or other malt beverages.

Strong Federal leadership in this area is critical, as state definitions of "beer," "malt beverage," and "spirits" are extrapolated from Federal guidelines. This crucial product distinction and definition ensures consistent and equitable licensing, taxing, distribution and advertising policies set forth therein.

Given this, any alternative to the TTB proposal will likely increase disruptive and conflicting state legislative and regulatory actions while decreasing state and federal revenues.

As a small brewer, we support "0.5% standard" for FMBs. Please maintain the integrity of malt beverages in the beer classification. Please support TTB, beer tradition and marketplace equity.

Sincerely,
Sanford T. Savage
Owner