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Point Pleasant Distributors. Inc.

September 12, 2003

Attn: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
PO Box 50221
Washington, D.C. 20091-0221

Dear Sir or Madam:

Point Pleasant Distributors supports the proposed rule issued March 2003 by the Tax and Trade Bureau (TTB) that outlines the alcohol content required in order for flavored malt beverages (FMB) to be classified as beer. Specifically, the TTB proposes that for an FMB to be classified as beer, its alcohol content from distilled alcohol cannot exceed 0.5%.

Point Pleasant Distributors has been a beer wholesaler since prohibition was repealed and is acutely aware of the distinction between beer which gets its alcohol through brewing and other drinks that derive their alcohol from distilled spirits or fortified wine. Beer has always been viewed as a product of moderation while distilled spirits and fortified wine are higher in alcohol content and require a more sophisticated consumer to be used safely. The government has recognized the difference between beer and distilled spirits as early as the 1800's when Congress defined beer and imposed the beer excise tax.

If this proposed rule is not adopted, the traditional distinction between beer and other alcohol products will, overtime, disappear. The adoption of the TTB 0.5% by volume standard would ensure that the distinction between beer and other alcohol beverages remains clear, real and significant to consumers.

Once again, Point Pleasant Distributors encourages the TTB to give final approval to the proposed 0.5% standard on FMBs.

Sincererely,

Edward B. Wardell
President

2350 Highway 34, PO Box 619 Allenwood, NJ 08720
Phone: 732/223-2337 Fax: 732/223-2330