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CENTENNIAL
DISTRIBUTING, INC.

September 8, 2003

Attn: TTB Notice No. 4

Chief, Regulations and Procedures Division

Alcohol and Tobacco Tax Division

P.O. Box 50221

Washington D.C. 20091-0221

Dear Sir or Madam:

Centennial Distributing supports the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that outlines the alcohol content requirements 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%.

Beer has always been regulated and taxed differently than any other alcohol and the TTB proposal is consistent with how they have always interpreted what constitutes beer and other malt beverages.

Consistent regulatory practice is important because most states follow Federal regulatory guidelines. This rule will help maintain an orderly fashion in the way we run our business and will eliminate any issues we will encounter at the state level.

There is an important distinction between beer and distilled spirits and by supporting the 0.5% standard you will ensure that the integrity of beer remains.

Once again, Centennial Distributing encourages the TTB to give final approval to the proposed 0.5% standard in FMB's.

Sincerely,
Mark T. Duvall
Owner/Manager

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