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From: jsparacio@nwscorp.com  
Sent: Tuesday, September 16, 2003 12:28 PM  
To: Rulemaking, TTB  
Subject: 'TTB Notice No. 4'

name=Jennifer Sparacio  
name=United States Beverage, LLC  
Address1=700 Canal St  
Address2=  
City=Stamford  
State=CT/USA  
Zip Code=06902  
Comments=September 16, 2003

Chief  
Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Washington DC 20091-0221

RE: TTB Notice Number Four

To Whom It May Concern:

I am writing to express my support for the 51-49 Majority Standard in the reformulation of flavored malt beverages. This approach is equitable and more consistent with the policy that the government has followed for twenty years. Federal policy requires 25% of the fermentable base in a malt beverage to be malt, 50% of the fermentables in a beer to be grain and 25% of the fermentable base in a wheat beer to be wheat. Why should flavored malt beverages be held to a standard that is unprecedented in the industry?

The major brewers in this country are lobbying for the 0.5% standard to be adopted because the small brewers are cutting into their profits. While they claim to have found ways reformulate their products to meet this standard, small brewers simply do not have the financial resources to do so. The restrictive 0.5% standard will undoubtedly threaten the taste of the products and severely reduce shelf life. Such a standard will likely eliminate some of my favorite products from the marketplace.

The classification as flavored malt beverages as distilled spirits will change the distribution channels and pricing structure. As a consumer, I am most likely to purchase FMB's in a grocery or convenience store. The chance of me going to a liquor store to buy a FMB at a higher price than I am used to paying, is very slim.

Please do not succumb to political pressure by industry giants and pass regulations that will make it impossible for me to get the high quality, superb-tasting flavored malt beverages that I have become accustomed to.

Sincerely,  
Jennifer Sparacio