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September 5, 2003

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P. O. Box 50221
Washington, D. C. 20091-0221

Attention: TTB Notice No. 4
Dear Sir or Madam,

Standard Distributors, Inc. supports the proposed rule issued in March 2003 which outlines the content requirements for flavored malt beverages if they intend to be classified as beer. We support the proposal that alcohol content from distilled alcohol not exceed 0.5%.

This proposed rule is consistent with the historic treatment, regulation and taxation of beer. The rule as proposed reinforces the traditional and very important distinction between beer and products with higher alcohol content.

Consistent regulatory policy is important because it sets important distinctions for all fifty states to follow and helps maintain an orderly marketplace. Unclear standards or multiple standards cause costly and confusing issues to arise in state licensing, taxation and distribution policies. As a beer wholesaler I believe that any policy other than the one proposed by the Bureau would be harmful to beer wholesalers and to the entire alcohol industry.

Standard Distributors, Inc. urges the TTB to give final approval to the proposed 0.5% standard for flavored malt beverages.

Very truly yours,

Tom D. Efird, President
Standard Distributors, Inc.

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