

September 22, 2005

William H. Foster, Chief  
Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
P.O. Box 14412  
Washington, DC 20044-4412

ATTN: Notice No. 41

Dear Mr. Foster;

With regard to Notice No. 41 where the TTB is seeking public comment on whether additional requirements should be added to current alcohol product labels, I write to oppose any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising. The longstanding federal policy of using the percent alcohol by volume, or proof, is the most appropriate way to describe alcohol content. I am strongly opposed to any "standard serving" measurement. Communicating alcohol content in this way would be misleading to the public and would hinder, rather than promote, responsible drinking. This misguided attempt would cover up the significant differences in strength, concentration and effect between hard liquor, wine and beer.

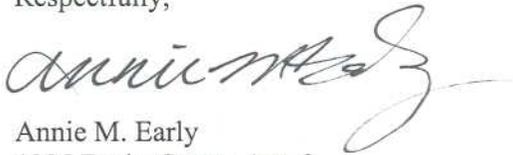
In addition, TTB should recognize there is no such thing as a "standard serving." While "serving size" is fairly common for beer, it varies widely for hard liquor. Different measuring jiggers for hard liquor contain anywhere from 1 to 3 fluid ounces and most mixed drinks are "free poured." Moreover, very few people could define a 'standard serving' for ports, sherries, liqueurs, fortified wines, and other less-common alcohol beverages.

Further, state law and regulation will be negatively impacted by an effort to allow absolute alcohol per standard serving information on a label. Labeling the percentage of alcohol is the proper policy. Thus, changes in this area could put companies at risk of violating state laws.

I urge your opposition to this measure. I only view this as a misleading effort that will ill serve the public good and cause more public confusion, not less.

Thank you for your attention to this matter.

Respectfully,



Annie M. Early  
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