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September 12, 2005

Subject: Notice No. 41: Labeling and Advertising of Wines, Distilled Spirits and Malt Beverages

Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 41
P.O. Box 14412
Washington, DC 20044-4412

The NC Beer and Wine Wholesalers Association opposes the hard liquor industry's dangerous and misleading effort to promote a "standard drink."

Liquor comes in many strengths and mixtures, and hard liquor drinks can vary dramatically in alcohol content based on the brand used, the recipe and the bartender pouring. In fact, a single mixed drink, made according to many liquor company recipes, often contains more alcohol than the total daily alcohol intake for men and women in the Dietary Guidelines for Americans.

Comparing the alcohol content of a martini to that of a beer is simply absurd. In our experience, consuming a hard liquor drink has a more dramatic affect on sobriety than drinking a beer or glass of wine.

Creating a "standard serving" would confuse consumers more than help. We support the longstanding TTB regulations requiring display of the percentage of alcohol by volume as the best means of indicating alcohol content on a product label or in advertising. Displaying alcohol content in terms of "fluid ounces" of pure alcohol per "standard serving" is a difficult calculation, which is also misleading, unnecessary and potentially harmful.

Sincerely,

Chris A. Valauri, President