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September 22, 2005

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

Dear Mr. Foster:

On behalf of the Vermont Wholesale Beverage Association (VWBA), I am writing regarding Notice No. 41, the Advanced Notice of Proposed Rulemaking wherein the Alcohol and Tobacco Tax and Trade Bureau (TTB) is seeking public comment on whether additional requirements should be added to current alcohol product labels.

By way of background, VWBA is a trade association that includes four beer and wine distributors in Vermont, including Baker Distributing, DeWitt Beverage, Farrell Distributing and Ghousen-North. These companies distribute beer and wine to over 2,000 bars, restaurants and stores in Vermont.

VWBA strongly opposes proposals to display alcohol content in terms of fluid ounces of pure alcohol per "standard serving." These proposals would cover up the significant differences in strength, concentration and effect between liquor, wine and beer.

Moreover, communicating alcohol content in this way is misleading to the public and would hinder, rather than promote, responsible drinking. Telling the public that drinking hard liquor is the same as drinking beer makes it harder for the public to moderate their alcohol intake. VWBA members actively promote moderate alcohol consumption in our communities in numerous ways, including sponsoring speakers in local high schools and distributing information on teen drinking to Vermont parents and teenagers, to name just a few. We believe these proposed labels will undermine those efforts by confusing the public on how much alcohol they can safely and moderately consume.

We support continuing the longstanding federal policy of using the percent of alcohol by volume, or proof, as the only appropriate way to describe alcohol content.

We request that you oppose this misleading effort that will not serve the public good.

Thank you for considering these comments.

Sincerely,



Clare Buckley