



JACKSON BEVERAGE COMPANY

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September 21, 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

I oppose the hard liquor industry's dangerous and misleading effort to promote a "standard drink."

Comparing the alcohol content of a Long Island Ice Tea (a highball glass of only distilled spirits concocted to taste like sweet tea, not an adult alcohol beverage) to a 12 oz beer is dangerous, unhealthy and very wrong! In my experience, consuming a hard liquor drink has a more dramatic affect on my sobriety than drinking a beer or glass of wine.

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.

Creating a "standard serving" would confuse consumers more than help. I support the longstanding TTB regulations requiring display of 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,

Frank Duch
Jackson Beverage Company
805 North 23rd Street
Wilmington, NC 28405