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GEORGE ONORATO
SENATOR, 12TH DISTRICT

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September 7, 2005

William H. Foster
Chief, Regulations & Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
ATTN: Notice No. 41
PO BOX 14412
Washington, DC 20044-4412

Dear Mr. Foster:

I am writing with regard to Notice No. #41, which seeks to institute new rules for alcoholic beverage labeling.

While I do not oppose the idea of providing greater information to consumers regarding calorie content, ingredients and other nutritional issues on alcoholic beverage labels, I am concerned about the proposal to display alcohol content in terms of pure alcohol per "standard serving." This could be misleading and potentially dangerous for consumers who might come to believe that drinking three beers is the same as drinking three martinis, which are individually mixed and often contain varying amounts of spirits. The problem is that a "standard serving" might vary widely from drink to drink, depending on its recipe and the person who is preparing it.

In my view, the longtime federal policy of using the percentage of alcohol by volume, or proof, to describe alcohol content continues to be the most appropriate means of addressing this issue. In general, consumers are accustomed to this system and understand it, so why fix something that isn't broken?

I appreciate your attention to this issue. Thank you for your consideration of my views.

Sincerely,

George Onorato
State Senator, 12th SD

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