



September 15, 2005

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

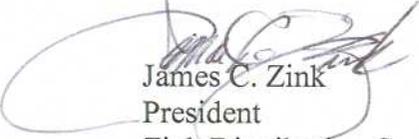
Dear Sir:

I oppose the hard liquor industry's dangerous and misleading effort to promote a "standard drink". I do support continuing the federal policy of using the percent alcohol by volume, or proof, as the only appropriate ways to describe alcohol content. The approach not only maintains a longstanding federal policy, it also works well with the labeling policies of many states.

I strongly oppose proposals to display alcohol content in terms of fluid ounces of pure alcohol per "standard serving." This misguided attempt would cover up the significant differences in strength, concentration and effect between liquor, wine and beer. Communicating alcohol content in this way could be misleading and potentially dangerous and would hinder, rather than promote, responsible drinking.

Creating a "standard serving" would confuse consumers more than help. 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. While "serving size" may be fairly common for beer, it varies widely for wine and liquor, especially when it comes to mixed drinks. This wide variation makes the term all but meaningless and it has no place on alcohol beverage labels. I urge you to reject this misleading phrase that could cause more public confusion, not less.

Thank you for your attention to this matter.



James C. Zink
President
Zink Distributing Co.