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September 23, 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, DC 20044-4412

Dear Sir:

With regard to Notice No. 41, the TTB is seeking public comment on whether additional requirements should be added to current alcohol product labels. I write to oppose any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising. My primary area of concern relates to how the amount of alcohol in a product should be communicated.

On the question of alcohol content, I support continuing the longstanding federal policy of using the percent alcohol by volume, or proof, as the only appropriate ways to describe alcohol content. We 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 hard liquor, wine and beer. Communicating alcohol content in this way would be misleading and potentially dangerous and would hinder, rather than promote, responsible drinking.

Instead, continuing the longstanding and meaningful measure of the percentage of alcohol by volume is in the best interests of consumers and the public.

I would ask that you do not support this misleading effort that will ill serve the public good and cause more public confusion, not less.

Thank you for your attention to this matter.

Respectfully,

  
Martin Schreiber