



**COMMONWEALTH OF VIRGINIA**  
**HOUSE OF DELEGATES**  
**RICHMOND**

**ROBERT D. "BOB" HULL**  
POST OFFICE BOX 2331  
FALLS CHURCH, VIRGINIA 22042

THIRTY-EIGHTH DISTRICT

COMMITTEE ASSIGNMENTS:  
GENERAL LAWS  
FINANCE  
COUNTIES, CITIES AND TOWNS

August 29, 2005

William H. Foster  
Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
U.S. Department of the Treasury  
P.O. Box 14412  
Washington, D.C. 20044-4412

Re: Notice Number 41

Dear Mr. Foster,

It is my understanding that your bureau has been asked to consider a proposal to allow makers of distilled spirits to apply alcohol content labeling based upon a so-called "standard serving" instead of including the percent alcohol by volume, or proof, of the alcoholic beverage on the label, as has been the historic standard in the United States.

As a member of the General Laws Committee of the Virginia House of Delegates, which is responsible for legislation relating to Virginia's alcoholic beverage control system, I urge you to reject this proposal and continue to support the historic standard of using proof as the only appropriate manner to describe the alcohol content of alcoholic beverages in the United States.

Standard serving information on food labels works well because the caloric, vitamin, and mineral content of a certain volume of a food item can easily be discerned. But, that is not the case with a distilled spirit because it is generally not consumed by itself. It is mixed with other beverages and the alcohol content of this mixed drink varies depending on the person making the drink and the size of the container in which it is served. There really is no standard serving of a distilled spirit.

Virginia has a long standing statutory policy of distinguishing between distilled spirits, which are generally mixed with other beverages, and beer and wine, which are usually consumed as purchased. I believe that "standard serving" information on the labels of distilled spirits will distort that difference and confuse consumers.

I am particularly concerned that such labeling will have the effect of encouraging consumption of distilled spirits by younger consumers who may not have enough experience to know the difference between distilled spirits and beer and wine, which could, in turn, lead to more drunk driving and highway deaths.

I believe strongly that the historic standard of using proof as the only appropriate manner to describe the alcohol content of alcoholic beverages has worked well in Virginia and the United States and that it should continue. I urge your bureau to maintain this standard. Thank you.

Sincerely,  
  
Robert D. Hull