

September 23, 2005

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

Dear Sir,

With regard to Notice No. 41 where 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 a listing of the amount of pure alcohol on labels or advertising. On the questions of alcohol content, I support continuing the federal policy of using the percent alcohol by volume, or proof, as the only appropriate ways to describe alcohol content. This 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. Instead, continuing the more meaningful measure of the percentage of alcohol by volume is in the best interests of consumers and the public.

In addition, TTB should recognize there is no such thing as a "standard serving" and this too should be not be permitted on any alcohol labels or advertising. 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.

Respectfully,  
Stephen Gustafson  
President  
Falls Distributing Company