

<< 0041288 >>

F & DISTRIBUTORS, INC.  
Box 631  
31 Eastern Avenue Phone (860) 442-1265  
New London, Connecticut 06320 Fax: (860) 442-3416

9/8/03

Attn: TTB NO. 4  
Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
PO Box 50221  
Washington, D.C. 20091-0221

Dear Sir or Madam:

The purpose of this letter is to ask you to adopt the TTB "0.5 by volume standard." In doing so beer and the brewing process would remain separate from that of distilled spirits. Equating beer with distilled spirits would weaken important distinctions between beer and products with higher alcohol contents. This could be dangerous to the consumer when trying to make alcoholic beverage purchases.

Flavored Malt Beverages as ruled by the TTB are classified as a beer as long as their alcohol content does not exceed 0.5% from distilled alcohol. Ensuring this ruling would help to maintain an orderly marketplace and avoid costly and confusing disruptions in state licensing, taxation and distribution policies, any of which would deal a severe blow to beer wholesalers.

Beer is not distilled spirits. Beer is not a fortified wine. Beer is made through the brewing process. The 0.5% standard will ensure that the integrity of beer remains.

Once again, F&F Distributors encourages the TTB to give final approval to the proposed 0.5% standard on FMBs

Sincerely,

Eric A. Filardi  
Vice President

bc: NBWA