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HUMBOLDT BEER DISTRIBUTORS  
202 COMMERCIAL STREET  
EUREKA, CA 95501  
September 16, 2003

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
P.O. Box 50221  
Washington, DC 20091-0221

RE: TTB Notice No. 4  
Dear Sir or Madam,

Humboldt Beer Distributors opposes the rule issued in March 2003 by the Tax and Trade Bureau that outlines the alcohol content requirements in order for flavored malt beverages to be classified as beer.

We believe that the adverse consequences of the 0.5% standard would be devastating to the flavored malt category. We would like to support the TTB alternative which is at least 51 % of alcohol content of malt beverage be derived from fermentation at the brewery. We believe the alternative standard will help to ensure that flavored malt beverage products will continue to taste the same which means consumers will more likely continue to purchase these products. The alternative standard would be less costly for flavored malt beverage companies in terms of reformulation and the production costs which will help to preserve competition in the marketplace.

As a purchasing agent for almost 10 years, I have seen many changes in the marketplace I would like to see the decisions made on behalf of fairness for all not just the "big money". The two major brewers are unable to penetrate this category. So the only alternative they have is to try and attack the little guys who have created this segment. They can't buy the business so they continually try to eliminate the competitors with rule changes. Please have consideration for the small brewer who is supplying the consumer with an enjoyable beverage.

Sincerely,

Joel Bahrenfuss , Purchasing Agent  
Humboldt Beer Distributors