

<< 0043490 >>

09/25/2003 06:42 7152417556 KIM FISCHER PAGE 01/01
0003490

Central Beer Distributors
Miller Lite
300 Creske Avenue, Mosinee, WI 54455
(715)359-8252

October 18,2003

Chief Regulations, Procedures Divison
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 50221
Washington, D.C. 2009J -0221

Dear Sir or Madam:

Please accept my memo as input as you make decisions on this topic. I support the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that states that for an FMB to be clasnified as beer, its alcohol content from distilled alcohol cannot exceed 0.5%.

Beer in this country has been identified as a unique product and has been regulated and taxed differently than other alcohol beverages throughout our history. Your proposed rule is consistent with the historical interpretation of what constitutes beer and other malt beverages. Adoption of the TTB "0.5 by volume standard" would ensure the integrity of beer and the brewing process.

This proposed rule is critical to maintain an orderly marketplace and avoid costly and confusing disruptions in state licensing, taxation and distribution policies. Equating beer to beverages that derive a majority of their alcohol content from distilled spirits could weaken the important distinctions between beer and products with higher alcohol content. These distinctions impact state and federal policies regarding the regulation and taxation of beer and other alcohol beverages.

Beer is not distilled spirits. Beer is not fortified wine. Beer is not a product that has been made through the distillation process. Beer is made thzough the brewing process. The 0.5% standard will ensure that the intagrity of beer remains.

MIke Fischer
Central Beer Distributors
300 Creske Avenue
Mosinee, WI 54455