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From: Cargill, Barry [bsc@sbam.org]  
Sent: Tuesday, October 21, 2003 11:42 AM  
To: 'nprm@ttb.gov'  
Cc: Eric Henning (E-mail); Gerry, Angela; Fowler, Rob  
Subject: Proposed rulemaking for flavored malt beverages (2001R-136P)

October 21, 2003

Chief, Regulations and Procedures Division

Alcohol And Tobacco Tax and Trade Bureau

P.O. Box 50221

Washington, DC 20091-0221

Attn: Notice 4

RE: Flavored Malt Beverages 2001R-136P

Dear Sir or Madam:

On behalf of the 6,000 members of the Small Business association of Michigan (SBAM), I am writing to express our support for U.S. Treasurys Alcohol and Tobacco Tax and Trade Bureau proposed rulemaking for flavored malt beverages. (2001R-136P)

The Bureaus action is an important clarification of the federal alcohol beverage categories established to maintain an orderly US marketplace. It is my understanding that with SBAMs support for the proposed 0.5% standard, we are joining with the Beer Institute, the National Beer Wholesalers Association, and major small brewer associations, among many others, because this standard is the most efficient means to address recent concerns by both federal and state officials. The proposed reformulated products will be consistent with state tax, license, and distribution laws allowing wholesalers and retailers to continue to distribute, sell and market flavored malt beverages as they do today.

In this situation, we believe a national standard is more appropriate to prevent the patchwork of inconsistent state laws where products distributed in one state may be ultimately sold as a beer but as a distilled spirit in another.

Thank you for this opportunity to express the position of the Small Business Association of Michigan for the current TTB proposed rulemaking for flavored malt beverages.

Sincerely,

Barry S. Cargill

Vice President for Government Relations

Small Business Association of Michigan

222 N. Washington Square, Suite 100

Lansing, Michigan 48933

517 482-8788

[bsc@sbam.org](mailto:bsc@sbam.org)