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September 6, 2005

William H. Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 14412
Washington, DC 20044-4412

RE: Opposition to Notice No. 41

Dear Mr. Foster;

On behalf of the National Troopers Coalition (NTC), I am writing to oppose Notice No. 41 on whether additional requirements should be added to current alcohol product labels. Our primary area of concern relates to how the amount of alcohol in a product should be communicated. The NTC opposes any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising.

On the question of alcohol content, the NTC supports continuing the longstanding federal policy of using the percent alcohol by volume, or proof, as the only appropriate ways to describe alcohol content. The NTC strongly opposes 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 hard liquor, wine and beer. Communicating alcohol content in this way would be misleading and potentially dangerous and would hinder, rather than promote, responsible drinking.

The National Troopers Coalition asks that you do not support Notice No. 41, a measure that will cause more public harm than good. Labeling the percentage of alcohol is the proper policy.

Thank you for your attention to this matter.

Respectfully,

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Casey Perry, Executive Director
National Troopers Coalition