

IOWA GROCERY INDUSTRY ASSOCIATION

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September 8, 2005

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William H. Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
ATTN: Notice No. 41
PO Box 14412
Washington, DC 2004-4412

Dear Sir,

On behalf of the Iowa Grocery Industry Association (IGIA) I am writing with regard to Notice No. 41 where the TTB is seeking public comment on whether additional requirements should be added to current alcohol product labels. IGIA opposes any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising. Our main concern relates to how the amount of alcohol in a product should be communicated. For alcohol content, we continue to support the longstanding federal policy of using the percent of alcohol by volume, or proof, as the appropriate way to describe alcohol content. IGIA would oppose proposals to display alcohol content in terms of fluid ounces of pure alcohol per "standard serving." IGIA believes this 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 to consumers, and would hinder, rather than promote responsible drinking. Continuing the longstanding measure of the percentage of alcohol by volume is in the best interests of consumers and the public.

In addition, TTB should recognize there is no such thing as a "standard serving" and this should not be permitted on any alcohol labels or advertising. While "serving size" is fairly common in beer, it varies widely for hard liquor. Different measuring jiggers for hard liquor contain anywhere from 1 to 3 fluid ounces and most mixed drinks are "free poured." Logic dictates that there is no such thing as a "standard serving."

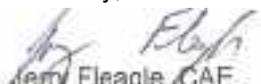
If you were to go to look at the "top 10" hard liquor drinks on popular mixed drink websites like Happyhour.net, Barfliers.com and DrinkNation.com, you would see that the average drink contains 75% more alcohol than the hard liquor industry's so-called "standard drink." In fact, drinks like a Mohito, Mai-Tai, Martini or Long Island Iced Tea contain significantly more alcohol than a "standard 1.5 ounce serving."

Further, state law and regulation will be negatively impacted by an effort to allow absolute alcohol per standard serving information on a label. Labeling the percentage of alcohol is the proper policy, and has served the public well. Changes in this policy would put companies at risk of violating state laws in all 50 states.

IGIA would ask that you do not support this misleading effort that will ill serve the public good and cause more public confusion, not less.

Thank you for your attention to this matter.

Sincerely,


Jerry Fleagle, CAE
President