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Clifton Park, NY 12065
August 29, 2005

William H. Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington, DC 20044-4412

Dear Sir:

The TTB is seeking public comment on Notice No. 41 as to whether additional requirements should be added to current alcohol product labels, I write to oppose any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising.

I support continuing the longstanding federal policy of using the percent alcohol by volume, or proof, as the only appropriate ways to describe alcohol content. I strongly oppose the thought of displaying 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 liquor, wine and beer.

In addition, the TTB should recognize there is no such thing as a "standard serving" and this too should not be permitted on any alcohol labels or advertising. While "serving size" is fairly common for 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." Moreover, very few people could define a 'standard serving' for ports, sherries, liqueurs, fortified wines, and other less-common alcohol beverages.

Further, looking at the "top 10" hard liquor drinks on popular mixed drink websites like Happy-Hour.net, Barfliers.com, and DrinkNation.com, confirms 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."

We currently have a system in place that works, let's keep it that way.

Thank you for your attention to this matter.

Respectfully,

