



August 24, 2005

**National
Puerto
Rican
Coalition,
Inc"**

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

Dear Mr. Foster:

On behalf of the National Puerto Rican Coalition Inc., representing the interests of close to eight million Puerto Ricans living on the mainland United States and in Puerto Rico, I commend the Alcohol Tobacco Tax and Trade Bureau for seeking public comment on new, consumer-friendly labeling requirements. We believe new label information will help consumers make informed decisions about what and how much to drink.

Providing consumers with additional information about the amount of alcohol per serving in the beer, wine and distilled spirits products they consume is a matter of great importance. Hispanic Americans are at greater risk of alcohol-related diseases and motor vehicle crashes than the general population. According to the National Institute for Alcohol Abuse and Alcoholism, Hispanics are approximately twice as likely as Caucasians to die from cirrhosis, despite a lower prevalence of drinking and heavy drinking. Evidence exists that Hispanics tend to consume alcohol in higher quantities per drinking occasion than do Caucasians, resulting in a higher cumulative dose of alcohol. In addition, Hispanics have a higher prevalence than do Caucasians of hepatitis C, a serious infectious liver disease that greatly increases the risk for liver damage in heavy drinkers (NIAAA *Alcohol Alert* 55, January 2002).

Drunk driving statistics for Hispanics are equally disturbing. According to the National Highway Traffic Safety Administration, Hispanics are at higher risk of alcohol-related fatalities and injuries than the general population. Traffic crashes are the leading cause of death for Hispanics ages 1-34 in the United States. Alcohol-related crashes account for about half of all Hispanic traffic-related fatalities, as opposed to about 39% for the total population.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic consumer information. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide important information. The TT*B should require labels to list information such

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as serving size, and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving.

Of all this information, the amount of alcohol per serving is the most vital information for consumers to have. It is important that a benchmark of what constitutes a "drink" is established because that is how consumers account for their alcohol intake.

The U.S. government's advice on moderate drinking, as provided in *Dietary Guidelines for Americans* (USDA & HHS, 2005) reads:

The majority of American adults consume alcohol. Those who do so should drink alcoholic beverages in moderation. Moderation is defined as the consumption of up to one drink per day for women and up to two drinks per day for men. Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation. (p. 44)

Allowing placement of information on alcohol per serving and servings per container on beer, wine and distilled spirits labels will help consumers to understand what this advice means to them.

In order for consumer Serving Facts to be meaningful, the TTB must make clear in this rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make informed comparisons between products and to understand what is in a standard serving of any alcohol beverage.

The standard serving definition used in the *Dietary Guidelines* (12 ounces of regular beer, 5 ounces of table wine and 1.5 ounces of 80 proof distilled spirits) is one widely used by U.S. government agencies, public health groups, consumer groups, and a large majority of state driver's license manuals, therefore, it makes sense to use that definition as a standard metric for labels.

We urge the TTB to adopt a regulation that permits meaningful consumer-oriented Serving Facts on beer, wine and spirits labels. Meanwhile, I urge the TTB to allow manufacturers to voluntarily provide this kind of truthful, non-misleading information on labels while the rulemaking process proceeds.

Sincerely,

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