



Senator Paul T. Davis, Sr.
Republican Leader
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September 21, 2005

William H. Foster, Chief
Regulation and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
ATTN: Notice 41
PO Box 14412
Washington, D.C. 20044-4412

Dear Sir:

It is my understanding that the Tax and Trade Bureau is seeking comment on the matter of additional requirements to current alcohol product labels. I am writing to say that I am opposed to including "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising. I support the continued use of federal policy of using the percent alcohol by volume, or proof, as the appropriate way to describe alcohol content. The "standard serving" description cannot accurately account for differences in strength, concentration or effect between hard liquor, beer and wine. Labeling must not be confusing or misleading. I am concerned that the potentially misleading "standard serving" designation could be dangerous and could actually contribute to irresponsible use of alcohol. A "standard serving" for hard liquor is so varied that it renders the designation meaningless.

State law and regulation will be negatively impacted by efforts to allow absolute alcohol per standard serving information on a label. Labeling the percentage of alcohol is the appropriate policy. Changes in this area could put companies at risk of violating state laws and would put an undo burden on companies.

I am respectfully requesting, in the interest of the public good, that you do not support the effort. Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul T. Davis".

Paul T. Davis
Maine State Senator