



WYOMING TAXPAYERS ASSOCIATION

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September 16, 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:

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, 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.

Our primary area of concern relates to how the amount of alcohol in a product should be communicated and reported for taxation purposes.

We oppose 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.

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.

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. Thus, changes in this area could put companies at risk of violating state laws.

We 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 the opportunity to comment on this matter.

Sincerely,

Randy Bolles
Executive Director