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Atm: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
PO Box 50221
Washington, D.C. 20091-022 1

Dear Sir or Madam:

I support the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that establishes a "0.5% standard" in order for flavored malt beverages (FMB) to be classified as beer.

As someone who works for the beer industry I see every day that beer is a unique product that is regulated and taxed differently than other alcohol beverages. Congress even imposes a specific excise tax on beer based on upon their definition of what a beer is in the internal revenue code. Adoption of the TTB "0.5% standard" would ensure the integrity of beer and the brewing process remains in tact.

Equating beer and beverages that derive a majority of their alcohol content from distilled spirits could weaken the important distinctions between beer and products with higher alcohol content. These distinctions impact state and federal policies regarding the regulation and taxation of beer and other alcohol beverages. Furthermore, without the "0.5% standard" in place other alcohol producers will surely attempt to categorize themselves as beer products as well.

There is certainly reason that distilled spirits producers would like to blur the line between beer and liquor. This would allow them to push for equalization of the products and would get their products more advertising and marketing as well as more visibility in retail stores. While it's a valiant attempt, we cannot allow them to place their products under the umbrella of "beer". Beer

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is beer. It does not go through the distillation process, and it is not a fortified wine, it is a product that goes through the brewing process.

Beer drinkers. I think, expect beer to be beer. The TTB final approval to the proposed 0.5% standard on FMBs would ensure consumers are well served and their best interests protected.

Sincerely,

David R. Christn-ian