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BUDWEISER  
KING OF BEERS

GREAT RIVERS DISTRIBUTING CO., INC.

August 21, 2003

Attn: TTB Notice No.4  
Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
PO Box 50221  
Washington, DC 20091-0221

Dear Sir or Madam:

Great Rivers Distributing supports the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that outlines the alcohol content requirements in order for flavored malt beverages (FMB) to be classified as beer. Any product that has an alcohol content exceeding 0.5% from distilled alcohol cannot be classified as beer.

Taxing and regulations of beer have always been different than other alcohol beverages in the United States. The TTB proposed rule uses an historical interpretation to differentiate between beer and other malt beverages. Adoption of the TTB "0.5% by volume standard" would insure that the age-old production process and integrity of the beer brewing process remains in tact. I prefer to say. "If it's not broke, don't fix it."

One major point of difference between beer and other alcohol products is shelf life. Confusing disruptions in state licensing, taxations and distribution policies could jeopardize beer wholesaler's ability to maintain the retail sales market. Consistent regulatory policy is important.

Equating beer and beverages that derive a majority of their alcohol content from distilled sprits could weaken the important distinctions between beer and products with higher alcohol content. A line must exist. A Yugo and a Cadillac are not the same just because they are both cars.

If traditional distinctions disappear, it will only be a matter of time before other producers of alcohol beverages attempt to categorize themselves as beer products.

Beer is not distilled spirits. Beer is not fortified wine. Beer is not a product that has been made through the distillation process. Beer is made through the brewing process. The 0.5% standard will ensure that the integrity of beer remains.

Once again, Great Rivers Distributing encourages the TTB to give final approval to the proposed 0.5% standard on FMB's.

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GREAT RIVERS DISTRIBUTING CO., INC.

Sincerely,

Troy Bass  
Sales Manager  
Bc: NBWA

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