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PORT ANGELES DISTRIBUTING COMPANY

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September 8, 2003

Atm: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 50221
Washington, D.C. 20091-0221

This letter is in support of the proposed rule issued in March 2003 by the Tax and Trade Bureau which outlines alcohol content requirements in order for flavored malt beverages to be classed as beer. The proposal limits beverages classified as "beer" to have no more than 0.5 percent of their alcohol content originating from distilled alcohol, and would serve to better define exactly what "beer" is.

In our view beer is a beverage which has always been (rightfully) viewed as being different from other alcoholic beverages, such as spirituous liquor. Beer is taxed differently, as it should be, and adoption of the bureau's 0.5 percent by volume standard for alcohol content will help beer remain simply "beer." Differences between various alcoholic beverages should be pointed out and noted so that producers of beverages which really aren't beer at all are not able to label these products as beer. Beer is brewed. it is not distilled spirits, nor is it fortified wine. Please support the proposed rule for the 0.5 percent standard so that beer remains beer.

Sincerely,

Richard L. Brown
President