



League of United Latin American Citizens

NATIONAL PRESIDENT
Hector Flores

EXECUTIVE DIRECTOR
Brent A. Wilkes

NATIONAL OFFICERS
Rick Dovalina
Immediate Past President
Jaime P. Martinez
Treasurer
Miguel Zazueta
Youth President
Angie Garcia
VP for Elderly
Margaret Moran
VP for Women
Javier Montanez
VP for Youth
Joe Cardenas III
VP for Young Adults
Dave Rodriguez
VP for Farwest
Alicia Rios
VP for Midwest
Laura Medrano
VP for Northeast
Maria Rodriguez-Salazar
VP for Northwest
Haydee Rivera
VP for Southeast
Rosa Rosales
VP for Southwest

STATE DIRECTORS
Javier Herrera
Arizona
Carlos Cervantes
Arkansas
Angel G. Luevano
California
Steve Garcia
Colorado
Ada Peña
District of Columbia
Anita De Palma
Florida
Gilbert Romero, Jr.
Illinois
Maria de los Angeles Oria
Indiana
Gilbert Sierra
Iowa
Roddrigo Bonilla
Kansas
Regla Gonzalez
Massachusetts
Augustin Sanchez
Michigan
Enrique Soto
Minnesota
Hortencia Vasquez Wilcox
Missouri
Nicolas Martinez
Nevada
Jackie Hadzie
New Mexico
Rosa Tomes Caskey
Ohio
Rey Madrid
Oklahoma
Carmen I. Cruz
Puerto Rico
Roger C. Rocha
Texas
Leni Gonzalez
Virginia
Yolanda Santos Adams
Wisconsin

September 13, 2005

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington, DC 20044

Dear Chief:

Providing Hispanic consumers with additional information about the amount of alcohol per serving in the beer, wine and distilled spirits products they consume is a matter of great importance to the League of United Latin American Citizens. We commend the Alcohol & Tobacco Tax & Trade Bureau for seeking public comment on new, consumer-friendly labeling requirements for these products because we believe new label information will help consumers make informed decisions about what and how much to drink.

Hispanic Americans are at greater risk of alcohol-related diseases and motor vehicle crashes than the general population. According to the National Institute for Alcohol Abuse and Alcoholism, Hispanics are approximately twice as likely as Caucasians to die from cirrhosis, despite a lower prevalence of drinking and heavy drinking. Evidence exists that Hispanics tend to consume alcohol in higher quantities per drinking occasion than do Caucasians, resulting in a higher cumulative dose of alcohol. In addition, Hispanics have a higher prevalence than do Caucasians of hepatitis C, a serious infectious liver disease that greatly increases the risk for liver damage in heavy drinkers (NIAAA *Alcohol Alert* 55, January 2002).

Drunk driving statistics for Hispanics are equally disturbing. According to the National Highway Traffic Safety Administration, Hispanics are at higher risk of alcohol-related fatalities and injuries than the general population. Traffic crashes are the leading cause of death for Hispanics ages 1-34 in the United States. Alcohol-related crashes account for about half of all Hispanic traffic-related fatalities, as opposed to about 39% for the total population.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic consumer information on the label. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide important information on the label. TTB should require labels to list information such as serving size, and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving.

Of all this information, the amount of alcohol per serving is the most vital information for consumers to have. It is important that a benchmark of what constitutes a "drink" be established because that is how consumers account for their alcohol intake.

In order for consumer Serving Facts to be meaningful, TTB must make clear in this rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make informed comparisons between products and to understand what is in a standard serving of any alcohol beverage.

The standard serving definition used in the *Dietary Guidelines* (12 ounces of regular beer, 5 ounces of table wine and 1.5 ounces of 80 proof distilled spirits) is one widely used by U.S. government agencies, public health groups, consumer groups, and a large majority of state driver's license manuals. It makes sense to use that definition as a standard metric for labels.

I urge TTB to adopt a regulation that permits meaningful consumer-oriented Serving Facts on beer, wine and spirits labels. Meanwhile, I urge TTB to allow manufacturers voluntarily to provide this kind of truthful, non-misleading information on labels while the rulemaking process proceeds.

Sincerely,

Brent Wilkes
National Executive Director