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SERVING THE
COUNTIES OF
BENZIE,
LEELANAU,
MANISTEE
AND MASON

September 8, 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, D.C 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. My main concern relates to how the quantity of alcohol in a product should be expressed. On the question of alcohol content, I support continuing the standard federal policy of using the percent of alcohol by volume, or proof, as the only appropriate way to describe alcohol content. I strongly oppose proposals to display alcohol content in terms of fluid ounces of pure alcohol per "standard serving." This endeavor would cover up the significant differences in strength, concentration and effect between hard liquor, wine and beer. Communicating alcohol content in this way would be misleading and potentially dangerous, hindering rather than promoting, responsible drinking.

In addition, 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, fortified wines, mixed drink and miscellaneous alcohol beverages.

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, any changes on this legislation could put companies at risk of violating state laws and cause more harm than good.

I would ask that you do not support Notice No. 41. This proposal would cover up differences in strength, concentration, and effect, could potentially put companies at risk and would be difficult to define, overall negatively impacting consumers.

Thank you for your attention to this matter.

Sincerely,

David Palsrok
State Representative
101'st District

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