



COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

HARRY J. PARRISH
8898 BOND COURT
MANASSAS, VIRGINIA 20108-4327
FIFTIETH DISTRICT

August 25, 2005

COMMITTEE ASSIGNMENTS:
FINANCE (CHAIRMAN)
COMMERCE AND LABOR
RULES

Mr. William H. Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P. O. Box 14412
Washington, DC 20044-4412

RE: Notice No. 41

Dear Chief Foster:

As Chairman of the Finance Committee of the Virginia House of Delegates, with oversight responsibility for tax policy in the Commonwealth of Virginia, I urge you to retain the current federal policy of using the percent alcohol by volume, or proof, as the only appropriate way to describe alcohol content.

It is my understanding that there is a proposal being considered to "equalize" different forms of alcohol through a proposal to allow labeling of alcohol content based upon a "standard serving" measurement. I do not see how this would be either feasibly or practically possible because of the varying methods of adding alcohol to mixed drinks as well as the differing size/volume of the drinks produced.

Virginia has a longstanding policy of differentiating between distilled spirits and beer and wine. Any effort to include "standard serving" information on labels of hard liquor will distort these differences. It would also confuse consumer understanding of how much alcohol is actually contained in a variety of size and strength mixed beverages. In addition, this might have implications for Virginia tax law.

I appreciate your consideration of my comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Parrish", written over a light-colored background.

Harry J. Parrish
50th House District

cc: Congressman Frank R. Wolf
Senator John W. Warner
Senator George F. Allen