

September 7, 2005

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington DC 20044-4412

Dear Chief:

Texan Citizen Action Network is committed to allowing private business to voluntarily disclose information about their products. Current federal alcohol beverage label regulations do not allow most beer, wine and distilled spirits companies to provide information about their products so that consumers can make informed choices about what to drink and how much to drink.

As the saying goes, "There's nothing common, about Common Sense." TTB is to be commended for seeking public comment on this proposed change in regulations.

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 this type of information on the label. It just makes sense to allow labels to voluntarily list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving.

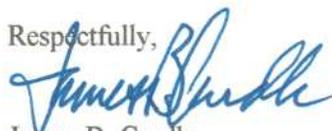
Of all this information, the amount of alcohol per serving would be highly beneficial for consumers to have.

Consumer Serving Facts will be more meaningful if TTB makes clear in this rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make more informed comparisons between products and better 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 majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

I cannot thank you enough for being open to the considerations here, urge TTB to act enact regulations permitting meaningful consumer-oriented Serving Facts on beer, wine and spirits labels, and urge the TTB to allow manufacturers to provide this non-misleading information on labels voluntarily while the rulemaking process proceeds.

Respectfully,



James B. Cardle
President & CEO
Texan Citizen Action Network