



September 19, 2005

William H. Foster, Chief  
Regulations and Procedures Division  
Alcohol & Tobacco Tax and Trade Bureau  
ATTN: Notice #41  
P.O. Box 14412  
Washington, DC 20044-4412

Dear Sir:

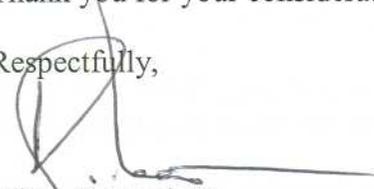
In response to Notice 41, encompassing the labeling of alcohol and beverages, I express great concern with the proposed use of the term "standard serving" and the method by which alcohol content is proposed to be labeled. Ludington Beverage opposes displaying alcohol content in terms of fluid ounces of pure alcohol per "standard serving". We instead support the continuum of the current federal policy utilizing proof of alcohol content in terms of volume percentage.

Beer, liquor and wine are vastly differing entities as are their effects on consumers. While a "serving size" for beer may be easily identifiable, a "serving size" for a bottle of wine becomes a calculation on the part of the consumer, leaving a margin for error and misinterpretation. A "serving size" for a mixed drink introduces potentially several calculations leaving a wider margin for misinterpretation. Furthermore, "serving size" is subject to each individual's subjective interpretation when providing amounts for use to create mixed drinks.

Voluntary nutrition labels promoting percentage of alcohol by volume, as presently being utilized, is the only clear referencing tool for the consumer. The components set forth in Notice 41 will inflict inaccuracy and misinterpretation onto the consumer. I strongly urge you to evade negative implications that are inevitable from use of a "standard serving" label.

Thank you for your consideration in this matter.

Respectfully,



Milan S. Reed, II  
Ludington Beverage