



COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

COLONEL DICK BLACK (USA RET.)
20978 FLATBOAT COURT
STERLING, VIRGINIA 20165

THIRTY-SECOND DISTRICT

COMMITTEE ASSIGNMENTS:
PRIVILEGES AND ELECTIONS
COURTS OF JUSTICE
EDUCATION
TRANSPORTATION

September 1, 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, DC 20044-4412

Dear Sir:

As a member of the Courts of Justice Committee of Virginia House of Delegates, which oversees policy development and penalties for violations of alcohol laws in Virginia, I urge you to support the long-standing federal policy of using the percent alcohol by volume, or proof, as the only appropriate way to describe alcohol content.

I am aware of efforts to include "standard serving" information of the amount of pure alcohol on labels or advertising. Virginia has a long-standing policy of differentiating between distilled spirits and beer and wine. Any effort to include "standard serving" information on labels of hard liquor will distort those differences and consumer understanding of how much alcohol is actually contained in a variety of size and strength mixed beverages.

There is no "standard serving" of hard liquor. It comes in many strengths and mixtures and hard liquor drinks can vary dramatically in alcohol content based on the brand used, the recipe and the individual pouring.

Virginians deserve meaningful labeling. In that regard, I hope the TTB will maintain percent alcohol by volume as the standard.

Sincerely,

Colonel Richard H. Black (Ret.)
Virginia House of Delegates
32nd District

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