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MILLER BREWING CO
SINCE 1855

MILWAUICEE.WIS USA

MISSISSIPPI BELLE DISTRIBUTING CO., INC.

August 12, 2003

Attn: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P O Box 50221
Washington, D.C. 20091-0221

Dear Sir or Madam:

MISSISSIPPI BELLE DISTRIBUTING CO., INC. supports the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that outlines the alcohol content requirements in order for flavored malt beverages (FMB) to be classified as beer, which means the FMB cannot exceed an alcohol content of 0.5%.

Beer is a unique product that has been regulated and taxed differently than other alcohol beverages throughout history. The TTB proposed rule is consistent with the historical perception of what constitutes beer and other malt beverages. The regulatory treatment of beer is based on its age-old production process and its definition dates back to the 1800's when beer excise tax was first imposed. Adoption of the TTB "0.5 by volume standard" would ensure the integrity of beer and the brewing process.

This proposed rule would help maintain an orderly marketplace and avoid costly disruptions in state licensing, taxation and distribution policies, which would deal a severe blow to beer wholesalers.

Moreover, being able to distinguish beer and beverages is very important because it has an impact on state and federal policies regarding the regulation and taxation of the two. Beer is not distilled spirits, it is not fortified wine, nor has it been made through a distillation process. Beer is made through the brewing process. This 0.5% standard will ensure that the integrity of beer remains. If traditional distinctions disappear, it will only be a matter of time before other producers of alcohol beverages attempt to categorize themselves as beer products.

Therefore, MISSISSIPPI BELLE DISTRIBUTING CO., INC. encourages the TTB to give final approval to the proposed 0.5% standard on FMB's.

Sincerely,

Mark F. Adams
President

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