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A. L. Gilbert Company  
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Since 1892 Bulk Dairy Feeds Sacked Feeds Liquid Feeds Field Seeds

August 19, 2003

Attn: TBB 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:

The A.L.Gilbert Company supports the proposed standard of composition for Flavored Malt Beverages ("FMB's"), as set forth by the Tax and Trade Bureau ("TBB") in TTB Notice No. 4 of March 2003. This proposal sets the difference between beer and other alcohol beverages.

We believe maintaining an orderly marketplace and helping to sustain consistency of federal alcohol beverage categories are primary concerns of the brewing industry. Federal leadership in this area is critical as state definitions of "beer", "malt beverage", and "spirits" are often very similar. Helping maintain clear and distinct definitions will guarantee consistent tax, licensing, and distribution policies for each category.

Any alternative could be disruptive to state legislative and regulatory actions. These measures could have significant ramifications for our industry.

We are a family business that markets spent brewers' grains to dairy and beef cattle in both California and Colorado. We support the proposed "0.5% standard" for FMB's. It will help maintain orderly marketing.

Sincerely,

Robert E. Gilbert, Chairman

David S. Gilbert, Chief Financial Officer