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From: Bryant [cbryant8@tampabay.rr.com]  
Sent: Monday, October 20, 2003 8:37 PM  
To: nprm@ttb.gov  
Cc: Dunbrew  
Subject: Support of TTB Notice #4

10/20/03 Chief, Regulations and  
Procedures Division Tax and Trade Bureau  
PO Box 50221 Washington, D.C. 20031-0221  
RE: TTB Notice #4 Dear Sir or Madam:  
Dunedin Brewery supports the proposed  
standard of composition for Flavored  
Malt Beverages ("FMB's"), as set forth  
by the Tax and Trade Bureau ("TTB") in  
TTB Notice No. 4 of March 2003. This  
proposal is essential to the beer  
manufacturers and customers as it  
clearly delineates the difference  
between beer and other alcohol  
beverages, requiring that the alcohol  
content in FMB's derived from distilled  
alcohol not exceed 0.5% in order to be  
classified as "beer." The  
United States has experienced a revival  
in the small brewing industry, from a  
low of 41 breweries to today's high of  
more than 1,300+ breweries. The revival  
is based on renewed commitment to  
traditional processes. This dedication  
to the art of beer has produced  
extensive investment in small businesses  
and the emergence of a group of  
consumers who appreciate the unique  
properties of beer. Many of our  
customers understand the attributes of  
beer and the impact of this rulemaking.

Continued success in the  
small brewing industry requires an even  
playing field for all industry members  
claiming to produce beer or other malt  
beverages. Our company regards this  
proposed rule as a critical step towards  
consistent classification of alcoholic  
beverages. An fair marketplace and  
consistency of laws and regulations  
establishing alcohol beverage categories  
are primary concerns of all of us in the  
brewing industry.

Also, any alternative to the TTB  
proposal will likely trigger disruptive  
state legislative and regulatory  
actions. These

for thousands of alcohol beverage  
licensees, most of which are also small

products of all types should be allowed in beer, but the addition of distilled alcohol from outside sources is not what the consumer expects in a beer, so the allowable amount should be as low as possible. At .5% the consumer should be notified.

Sincerely, DUNEDIN BREWERY

Michael N. Bryant  
Brewmaster/Proprietor