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Comment 679

Original Message

From: Joel Kadarrauch [mailto:jkadarrauch@Odomcorp.com]
Sent: Thursday, August 14, 2003 9:31 PM
To: 'nprm@ttb.gov'
Subject: Flavored Malt Beverages Rulemaking (2001 R-136P)

Dear Sir or Madam:

As General Manager of Odom Company's Beer, Wine and Spirits wholesaling business in the state of Alaska, I am writing to voice my support for the U.S. Treasury's Alcohol and Tobacco Tax and Trade Bureau proposed rulemaking for flavored malt beverages. (2001R-136P)

The TTB's action is a needed clarification of federal alcohol beverage categories. Further, I believe the debate surrounding the proposed standard poses important issues for the stability of the retail licensing system and the overall marketplace.

I join The Beer Institute, the National Beer Wholesalers Association, and major small brewer associations, among many others, with my support of the proposed 0.5% standard, because this standard is the most efficient means to address recent concerns by both federal and state officials. If adopted, the standard will maintain a more orderly marketplace, allow for consistent products, and help sustain the long-term development of the product category. In addition, these reformulated products will be consistent with state tax, license, and distribution laws allowing wholesalers such as myself and retailers to continue to distribute, sell and market flavored malt beverages as we do today.

Without a national standard rooted in existing law and regulation, manufacturers, retailers, and wholesalers will face a potential for a patchwork of individual state laws and regulations where the same product may ultimately be sold as a "beer" in one state and as a "distilled spirits" in another.

Thank you for this opportunity for me to offer my support for the current TTB proposed rulemaking for flavored malt beverages.

Sincerely,

Joel F. Kadarrauch
General Manager
Odom Company / Alaska

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