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MILLER BREWING CO

SINCE 1855

MILWAUKEE, WIS. USA

EASTOWN DISTRIBUTORS COMPANY

August 14, 2003

Attn: TIB 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:

Eastown Distributors Company supports the proposed rule issued in March by the Tax and Trade Bureau ('ITB). The TTB proposes that for an FMB to be classified as beer, its alcohol content from distilled alcohol cannot exceed 0.5%.

Beer is a unique product that has been taxed and regulated differently than other alcohol beverages and its definition in the IRS code dates back to the 1800's. Adoption of the ITB "0.5 by volume standard" would ensure the integrity of beer and its brewing process. 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.

Beer is not distilled spirits. Beer is not fortified wine. Beer is not a product that has been made through the distillation process. Beer is made through the brewing process. The 0.5% standard will ensure that the integrity of beer remains.

Once again, Eastown Distributors Company encourages the TTB to give final approval to the proposed 0.5% standard on FMBs,

Sincerely,

James R. Quasarano  
President

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