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CROWN BEER DISTRIBUTORS, INC.

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September 19, 2003

Awn: TTB Notice No.4

Chief, Regulations and Procedures Division

Alcohol and Tobacco Tax and Trade Bureau

PO Box 50221

Washington, DC 20091-0221

Dear Madam or Sir:

Crown Beer Distributors, LLC supports the proposed rule issued in March 2003 by the Tax and Trade Bureau that outlines alcohol content requirements in order for flavored malt beverages (FMB) to be classified as beer. Specifically The TTB proposes for an FMB to be classified as beer, its alcohol content from distilled alcohol cannot exceed 0.5%.

Beer has been consistently regulated and taxed differently throughout our nation's history. Adopting the 0.5 by volume standard would continue the long standing integrity and brewing process. Beer should not be classified or taxed the same as beverages that derive a majority of alcohol content from distilled spirits. If FMB's are not held to the 0.5 by volume standard then what products will try the same approach and want to be classified as beer.

In addition a consistent regulatory policy is important because while states enjoy regulatory power over alcohol, most follow federal regulatory guidelines. The proposed rule would help maintain an orderly marketplace and avoid costly and confusing changes in state licensing taxation or possible distribution policies, any of which would deal a serious blow to beer wholesalers.

I thank you for your time and consideration of our position that the TTB should give final approval to the proposed 0.5% standard on FMB's.

Sincerely,

Richard D. Koenig

President

Budweiser Bud Light Bud Dry Bud Ice . Bud Ice Light Michelob Michelob Light . Michelob Dark Michelob Dry AmberBock
Red Wolf. Busch Busch Light Busch Ice . Busch NA . Natural Light Natural Ice King Cobra . ODoul's O'Doul's Amber. Tequiza