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ADVANCE BEVERAGE COMPANY
"The Beverage Company With A Thirst For Excellence"
William K. Lazzerini Jr.

September 11, 2003

Attn: TTB Notice No. 4
Chief Regulations and Procedures Division
Alcohol & Tobacco Tax and Trade Bureau
P.O. box 50221
Washington, DC 20091-0221

Dear Sir or Madam:

Advance Beverage Company supports the proposed rule issued in March 2003 that outlines the alcohol content requirements in order for flavored malt beverages to be classified as beer. Specifically, the alcohol content cannot exceed 0.5% to be classified as beer.

Beer is a unique product and has been taxed and regulated differently than other alcohol beverages for decades. The TTB proposed rule is consistent with historical interpretation of what constitutes beer and other alcohol beverages. Adoption of the 0.5% standard will ensure the integrity of beer and the brewing process.

This proposed rule will help maintain an orderly marketplace. Equating beer and other beverages that derive a majority of their alcohol content from distilled spirits will weaken the important distinctions between beer and other products. Beer is not distilled spirits or wine. It is not a product that is made through the distillation process. Beer is made through the brewing process. The 0.5% standard will ensure the integrity of beer.

I urge the TTB to give final approval to the proposed 0.5% standard on flavored malt beverages.

Sincerely,

Bill Lazzerini
President

WKL/jg
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