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MILLER BREWING COMPANY

WRIGHT DISTRIBUTING CO., INC.

September 3, 2003

Chief of Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 50221
Washington, D.C. 20091-022 1

Dear Sir:

Wright Distributing Company, Inc. goes on record in support of the Tax and Trade Bureau proposed rule defining the alcohol content of flavored malt beverages (FMB) in order to be classified as beer. The proposed rule, as we understand it, says that in order for an FMB to be classified as beer, the distilled alcohol content cannot exceed 0.5 percent. This is a definition in line with the standard set many years ago by Congress when it determined what constituted "beer" and "malt beverages".~

Wright Distributing Company was established fifty-six years ago as a wholesale beer distributor, and we have maintained our status in the industry as we have grown over the years. We appreciate the opportunity to distribute new and innovative products which fall into the category of "brewed" beverages. Beer is not a distilled spirit, and we hope to maintain that distinction. We believe that to redefine "beer" is not the aim of the TTB, but there is definitely a need to define what is not "beer". We do not want to see this decision handed down to the states, where total chaos will reign. It is the responsibility of the TTB to set the record straight on this point of legal interpretation.

We are available for further comment if necessary. We are eager to see this matter put to rest so that we can go about our business of as a distributor of beers and flavored malt beverages. Thank you for consideration of the views of our distributorship.

Very sincerely yours,

Sandy Wright Kibby
Vice President

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