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Town & Country Distributors
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August 7, 2003

Attn: TTB 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:

As the owners of Town & Country Distributors, Inc. a Beer Distributorship business located in the Chicago, Illinois area we are writing you to express our support for the proposed rule issued in March 2003 by the Tax and Trade Bureau that outlines the alcohol content requirements in order for flavored malt beverages to be classified as beer. This is the proposal that calls for flavored malt beverages' alcohol not to exceed 0.5% in order to be classified as beer.

Historically in this country beer is a product that has been regulated and taxed differently than other alcohol beverages. The TTB proposed rule is consistent with this historical interpretation of what constitutes beer and other malt beverages. Adoption of the TTB "0.5 by volume standard" would ensure the integrity of beer and the brewing process.

Our view is that consistent regulatory policy is important because while states enjoy regulatory power over alcohol, most follow federal regulatory guidelines. This proposed rule would help maintain an orderly marketplace and avoid costly and confusing disruptions in state licensing, taxation and distribution policies, any of which would add a great deal of complexity and potential confusion to our business and that of our customers. Of equal importance, in our view, is the issue of equating beer and beverages that derive a majority of their alcohol content from distilled spirits. We feel strongly that this could weaken the important distinctions between beer and products with higher alcohol content. If that distinction were to disappear, it will only be a matter of time before producers of other of alcohol beverages attempt to categorize them as beer products.

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

Again, we would like to reiterate our recommendation that the TTB give final approval to the proposed 0.5% standard on Flavored Malt Beverages.

Thank you for your consideration.

Sincerely,

Lawrence S Sowa Anthony L. Franke
President Secretary/Treasurer