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August 11, 2003

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P. O. Box 50221
Washington, D.C. 20091-0221

Attention: TTB Notice No. 4
Dear Sir:

Northwest Arizona Distributors, Inc. supports the proposed rule used in March, 2003, by the Tax and Trade Bureau that outlines the alcohol content requirements in order for flavored malt beverages (FMB) to be classified as beer. Specifically, the TTB proposes that for a FMB to be classified as beer, its alcohol content from distilled alcohol cannot exceed 0.5%.

We feel this regulatory policy is important to maintain a consistent and orderly marketplace. Equating beer and beverages that derive a majority of their alcohol content from distilled spirits could weaken the important distinctions between beer and products with higher alcohol content. These distinctions impact state and federal policies regarding the regulations and taxation of beer and other alcohol beverages.

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. Only beer is made through the brewing process. The 0.5% standard will ensure that the integrity of beer remains.

Once again, Northwest Arizona Distributors, Inc. encourages the TTB to give final approval to the proposed 9.5% standard on FMB's.

Sincerely,

Chip Romer
President

NORTHWEST ARIZONA DISTRIBUTORS, INC.
2908 E. Andy Devine Avenue .Kingman, Arizona 86401 • tel: (928) 753-2704