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Beloit Beverage Co., Inc.

August 11, 2003

Attn: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
PO Box 50221
Washington, D.C. 20091-0221

Dear Sir or Madam:

This letter is being written to show support for the proposed rule issued during March 2003 by TTB. The proposed ruling states alcohol requirements for flavored malt beverages. Beloit Beverage Company, Inc. believes that all flavored malt beverages should be classified as beer and the alcohol content from distilled alcohol should not exceed the the limit contained in the TIB proposed rule.

Historically beer has been produced through a traditional brewing process. It is our opinion that beer should be regulated separately from distilled spirits and wine products. Beer is not a product that has been produced through a process of distillation. The standard of 0.5 by volume will help maintain the integrity of beer.

Regarding beer and distilled spirits as equal detract from the distinctions of the products. It seems that state and federal regulations and tax on beer and spirits should continue to be administered separately as distilled spirits contain higher alcohol content.

We also agree with the stipulation in the proposal that the alcohol content in flavored malt beverages would be 90% from the malting process and that not more than 10% should could come from alcohol flavoring.

Beloit Beverage Company agrees with the TTB proposal of March 2003 and would like to ask that the TTB grant its final approval.

Sincerely,

DON MORELLO
President

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