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TRIANGLE DISTRIBUTING COMPANY, INC.
Green Bay, WI 54324-0375

August 8, 2003

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

Thank you in advance for taking time to review my letter on this very urgent matter.

The subject is the "0.5% by volume standard" proposed (by the Alcohol and Tobacco Tax and Trade Bureau (TTB)) in March of 2003. This urgent matter relates to the content requirements for flavored malt beverages (FMB) and their classification as beer.

You are well aware and have recognized that beer is not distilled spirits or fortified wine nor is it made through the distillation process. Further you have declared beer is made through the brewing process.

The "0.5% by volume standard" would insure the integrity of the beer process, promote consistency of State and Federal regulations, avoid disruptions in state licensing, taxation and distribution policies, and, prevent equating beer and distilled spirits with higher alcohol content products.

If the traditional distinction of the flavored malt beverage is allowed to disappear, it will only be a matter of time, and, producers of alcohol beverages will be attempting to categorize themselves as beer products. This would be devastating to our industry.

Therefore, Triangle Distributing Co. Inc. encourages the TTB to give final approval to the proposed "0.5% by volume standard" on FMB.

Respectfully,

Jim Demeny, Off-Premise Sales Manager