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BEN B. KEITH COMPANY
1805 RECORD CROSSING

DALLAS, TEXAS 75235

HOWARD HALLAM
PRESIDENT

August 8, 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:

I am president of Ben E. Keith Company. This company is a beer distributor operating in 54 counties in Northeast and Central Texas. We have been distributing beer since the end of Prohibition in 1933.

I am writing to voice my 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 (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%.

Our company unequivocally supports this proposed rule. The introduction of FMBs has confused the historic distinction between beer and distilled liquors. Consumers are befuddled. Adoption of the TTB "0.5 by volume standard" would insure the integrity of beer and distinguish it from true distilled spirits.

I am proud to be a distributor of beer and not of distilled spirits. Beer has a long and honorable record of being the beverage of moderation. I do not want any confusion on this point.

Thank you very much.

Sincerely,

Howard Hallam
President