From: Fred Bowman [fbowman@portbrew.com]
Sent: Tuesday, October 21, 2003 2:29 PM
To: nprm@ttb.treas.gov
Subject: Flavored Malt Beverages

Dear Sir or Madam:

As the president of Portland Brewing
Company and someone who is deeply
concerned about preserving the integrity
of beer, I am writing to express my
support for the U.S. Treasury's Alcohol
and Tobacco Tax and Trade Bureau proposed
rulemaking for flavored malt beverages.
(2001R-136P)

        I believe the TTB's action is an
important clarification of federal
alcohol beverage categories established
to maintain an orderly US marketplace.
Further, I believe the debate surrounding
the proposed standard poses important
issues for the stability of the retail
licensing system and the overall
marketplace.

                Furthermore, the TTB
standard is the most efficient means to
address recent concerns by both federal
and state officials. If adopted, the
standard will maintain an orderly
marketplace, meet consumer expectations
for consistent products, and help sustain
the long-term development of the product
category. In addition, these
reformulated products will be consistent
with state tax, license, and distribution
laws allowing wholesalers and retailers
to continue to distribute, sell and
market flavored malt beverages as they do
today.

        However, absent a national
standard rooted in existing law and
regulation, manufacturers, retailers, and
wholesalers will face a

potential for a patchwork of individual
state laws and regulations where the same
product may ultimately be sold as a
"beer" in one state and as "hard liquor"
in another.

                Finally, while
there are some who have concerns
regarding the ability of manufacturers to

produce FMB products in accordance with the new proposal, as you may know, brewers have already demonstrated the expertise and technical ability to brew these products under the new federal standard.

Thank you for this opportunity to offer my support for your proposed FMB rule preserving the unique differences and integrity of beer. Sincerely,

Fred Bowman