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0003453 CALIFORNIA GROCERS ASSOCIATION www.cagrocers.com

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ATTN:TTB NoticeNo.4

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

(202) 927-8525 Fax nprm@ttb.treas.gov E-mail

Dear Sir or Madam:

I am writing to express the California Grocers Association view that any standard adopted by the TTB regarding Flavored Malt Beverages be uniform and national in scope. Without a uniform standard, market access to certain products may be disparate in areas where different standards would deviate from your federal rule-making process.

Many grocery retailers that operate in California also operate in other states. Having a uniform standard would lend itself to a more efficient, predictable system from point of manufacture to retail. A patchwork of laws and regulations would only add to the confusion of these products that already are some of the most regulated in the country.

Without advocating any particular standard under your review, the California Grocers Association would like to offer this insight as you

go about your deliberations on this important issue.

Sincerely

Peter Larkin

President & CEO California Grocers Association

555 Capital Mall, Suite 235 Sacramento, CA 95814 Tel: 916/448.3545 Fax: 916/448.2793 Email: cagrocers@cagrocers.com

555 E. Ocean Blvd, Suite 450 Long BEach, CA 90802 Tel 502/432.8610 Fax 562/432.7931 Email: cgasouth@cagrocers.com