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WHOLESALE DISTRIBUTORS OF ANHEUSER - BUSCH BEERS
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August 18, 2003

Attn: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 50221
Washington, DC 20091-022 1

Dear Sir or Madam:

Bibb Distributing Company supports the proposed rule released by the Tax and Trade Bureau (TTB) in March 2003 that summarizes the alcohol content requirements that allow the classification of flavored malt beverages (FMB) as beer. The TTB particularly suggests that for an FMB to be classified as beer, its alcohol content from distilled alcohol cannot surpass 0.5%.

Beer has been regulated and taxed differently than other alcohol beverages all through our country's history. The TTB proposed rule marks consistency with the historical understanding of what composes beer and additional malt beverages. Due to the age-old production process, beer is strongly regulated. Also, beer's definition in the Internal Revenue Code actually dates back to the 1800s when Congress originally imposed the beer excise tax. The integrity of the beer and the brewing process will be guaranteed if the TTB "0.5 by volume standard" is adopted.

Uniform regulatory policy is imperative because while states benefit from regulatory power over alcohol, most abide by federal regulatory guidelines. Not only would this proposed rule help preserve an orderly marketplace, it would also aid in the avoidance of pricey and confusing disruptions in state licensing, taxation and distribution policies.

Furthermore, linking beer and beverages that get a majority of their alcohol content from distilled spirits could reduce the key differences between beer and products with higher alcohol content. These distinctions influence state and federal policies concerning the regulation and taxation of beer and other alcohol beverages.

Should additional differences disappear, it will merely be a matter of time before other producers of alcohol beverages try to classify themselves as beer products.

Beer is not a distilled spirit or a fortified wine or a product that has been produced through the distillation process. Beer is prepared through the brewing process. The 0.5% standard will make certain that the integrity of the beer remains.

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Again, Bibb Distributing Company encourages the TTB to endorse the proposed 0.5% standard on FMBs.

Sincerely,

Winbum E. Stewart
President