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ASSOCIATED BEER DISTRIBUTORS OF ILLINOIS
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September 26, 2003

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O.Box50221
Washington, DC 20091-0221

Re: TTB Notice No. 4
Flavored Malt Beverages

Dear Chief Libettucci:

The Associated Beer Distributors of Illinois (ABDI), a state-wide trade association, for and on behalf of its members, submits the following comments in support of the proposed flavored malt beverage standard Published in the Federal Register (March 24, 2003).

The State of Illinois adopted the federal hws defining both "beer" and "malt beverages." The Illinois definition, similar to the federal definition, has basically remained consistent since the enactment of the Illinois Liquor Control Act shortly after the approval of the Twenty-First Amendment to the United States Constitution.

The proposal by the Alcohol and Tobacco Tax and Trade Bureau to adopt the level of 0.5% by volume for flavored malt beverages is consistent with Illinois law and regulations. The standard is also consistent with laws of several surrounding states. Furthermore, the adoption of the 0.5% standard will contribute toward adopting a national uniform standard.

The proposed standard will not adversely impact the present Illinois tax structure nor adversely affect the orderly marketplace of existing products.

ABDI strongly supports the 0.5% by volume standard.

We thank you for the opportunity to participate in the TTB rulemaking process. Please feel free to contact this office for any additional information.

Sincerely,

William D. Olson
Executive Vice President

WDO/HGB/mrf