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KALSEC

August 15, 2003
Attn: TTB Notice No. 4
Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 50211
Washington, D.C. 20091-0021

Dear Sir or Madam:

As a supplier to the malt beverage and beer industries, we wish to add our voice in support of the standard proposed in your TTB Notice No.4 of March, 2003. There is no need for added distilled spirits in these beverages, unless the seller wishes to increase the alcohol content to that of wines and hopefully avoid the tax on distilled spirits.

In our opinion, to increase the 0.5% limit would create utter confusion in the beverages traditionally made by fermentation of malt and adjuncts, and would certainly create uncertainty in the consumer's mind.

Furthermore, adding alcohol without regulation would permit drunk drivers to assert that all they had was a beer, as well as encourage over-drinking by teen consumers in particular.

We believe your proposed rule is in the public interest and should be adopted.

Very truly yours,

Paul H. Todd

Chairman

PHT/lc

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