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RITCHIE  
& PAGE

DISTRIBUTING Co I N C 292 THIRD STREET, P.O. BOX 2467/ TRENTON, NEW JERSEY 08607-24671 609•392•1146

August 14, 2003

Attn.: TTB Notice No. 4  
Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
POB 50221  
Washington, DC 20091-0221

Dear Sir:

The Ritchie & Page Distributing Company of Trenton New Jersey supports the proposed rule issued in March 2003 by the Tax and Trade Bureau (TTB) that outlines the alcohol content requirements in order for flavored malt beverages (FMB) to be classified as beer. It is imperative to our industry that malt beverages be distinctly classified as opposed to distilled alcohol and wine.

There is a definite distinction in the manufacturing process and the taxing regulations concerning beer, distilled spirits and wine. This difference has been recognized by the variances of excise tax on these products. The brewing process of beer makes it a distinct product which vastly differs from the distilling process and the wine making process.

The adoption of the TTB "0.5 by volume standard" will ensure the integrity of beer in the brewing process. It is evident that beer is in a category by itself as recognized the excises taxes, both federal and state. The 5% standard will ensure that the integrity of beer remains.

The Ritchie & Page Distributing Company encourages the Tax and Trade Bureau to give final approval to the proposed 5% standard on FMB's.

Thank you for your consideration in this matter.

Sincerely,

Louis A. Natale, Jr.  
President