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FLORAL CITY BEVERAGE, INC.

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Attn: TTB Notice No. 4 August 8, 2003

Chief, Regulations and Procedures Division

Alcohol and Tobacco Tax and Trade Bureau

P.O. Box 50221

Washington, D.C. 20091-0221

Dear Sir or Madam:

Floral City Beverage, Inc. 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. Specifically, the TTB proposes that for an FMB to be classified as beer its alcohol content from distilled alcohol cannot exceed 0.5%.

Beer is a unique product that has been regulated and taxed differently than other alcohol beverages throughout our nation's history. The TTB proposed rule is consistent with the historical interpretation of what constitutes beer and other malt beverages. Adoption of the TTB "0.5 by volume standard" would ensure the integrity of beer and the brewing process.

Equating beer and beverages that derive a majority of their alcohol content from distilled spirits could weaken the important distinctions between beer and products with higher alcohol content. These distinctions impact state and federal policies regarding the regulation and taxation of beer and other alcohol beverages.

If traditional distinctions disappear. it will only be a matter of time before other producers of alcohol beverages attempt to categorize themselves as beer products.

Beer is not distilled spirits. Beer is not fortified wine. Beer is not a product that has been made through the distillation process. Beer is made through the brewing process. The 0.5% standard will ensure that the integrity of beer remains.

Once again, Floral City Beverage, Inc. encourages the TTB to give final approval to the proposed 0.5% standard on FMBs.

Sincerely,

Michael J. Miller
Chief Executive Officer

bc: NBWA

Budweiser. Bud Light . Bud Dry. Bud Ice . Bud Ice Light . Michelob . Michelob Light . AmberBock

Red Wolf. Busch . Busch Light. Busch Ice. Busch NA • Natural Light . Natural Ice

King Cobra . O'Doul's. O'Doul's Amber. Tequila . Doc Otis