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MessageFrom: Larry P. Steinmetz [steinbierz@comcast.net]
Sent: Saturday, October 18, 2003 9:31 AM
To: nprm@ttb.gov
Subject: Flavored Malt Beverages and Related Proposals

October 18, 2003

Chief, Regulations and Procedures Division Tax and Trade
Bureau PO Box 50221 Washington, D.C. 20031-0221 RE: TTB
Notice #4, Flavored Malt Beverages and Related Proposals
(2001R-136P) Dear Sir or Madam: I support the proposed
regulations for products marketed as flavored malt
beverages (FMBs), as set forth by the Tax and Trade
Bureau (TTB) in TTB Notice No. 4 of March 2003. Beer is a
beverage with malt flavor and hop bitterness, flavor and
aroma. FMBs display none of these characteristics, and
should not be considered beer by any definition. A
comparison can be drawn to the growth of fruit beers in
the United States. While revolutionary in their flavor
and aroma, these products were clearly beers that had
flavorings added. There is no mistaking the hop and malt
character evident in all of these products. FMBs are not
beer-like in the least.

There are over 100 recognized beer style categories
and subcategories, as recognized by the American
Homebrewers Association and the Association of Brewers.
The Beer Judge Certification Program, which sets
parameters for beer evaluation and style, has not
recognized FMBs as a beer style for any of the
competitions they sanction. To consider
FMBs as beer is a threat to beer culture in the United
States, and would be damaging to the businesses of the
large and small brewers around the country. In 1978 there
were only 42 breweries in the U.S.; now there are over
1400. A whole industry of small brewers has formed over
this period, but that number is now shrinking again, in
part due to favorable business conditions provided to FMB
producers over beer brewers.

In summary, I support the proposed "0.5% standard" for
FMBs in order to preserve beer culture and to defend the
image of what the general public considers beer.

Sincerely, Larry P. Steinmetz