



STATE OF INDIANA
HOUSE OF REPRESENTATIVES
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ENVIRONMENTAL AFFAIRS
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ELECTIONS AND APPORTIONMENT, RMM

September 13, 2005

William H. Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington, DC 20044-4412

Dear Mr. Foster,

With regard to Notice No. 41, your recent solicitation seeking comment on whether additional requirements should be added to current alcoholic beverage labels, I write to oppose any possible changes that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising.

Any attempt to display alcohol content in terms of fluid ounces of pure alcohol per "standard serving" would not serve consumers or the public well. The "standard serving" designation is misleading at best and does not present a clear definition of the amount of alcohol actually in a drink as the term "standard serving" is not uniformly defined or followed. The term "standard serving" simply masks the significant differences in strength, concentration and effect between liquor, wine and beer.

With the question of alcohol content, I support the longstanding federal policy of using the percent alcohol by volume as the only appropriate way to describe alcohol content. Describing alcohol content in this manner provides the consumer with the most clear, consistent and informative information possible with regard to alcohol content and serving size. Any attempt to change the current method of labeling alcoholic beverages could potentially mislead consumers as to how much alcohol they are consuming. I believe any such changes to the current labeling system would hinder, rather than promote, responsible drinking.

I thank you for your attention to this matter and I appreciate the opportunity to voice my concerns. If you have any questions please feel free to contact me at 317-232-9798.

Sincerely,

Ed Mahern
State Representative
House District 97