

REP. ROBBIE WILLS
ARKANSAS HOUSE OF REPRESENTATIVES
DISTRICT 46
P.O. Box 306
CONWAY, AR 72033
(501) 730-4677
(501) 329-0321 Fnx
[v.illsr\(il\)arkleg.statc.ar.us](mailto:rwills@arkleg.state.ar.us)

August 22, 2005

William T. 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:

This letter is in regard to Notice No. 41 seeking input on the whether additional requirements should be added to current alcohol product labels. I oppose any efforts that would include "standard serving" information or an over-simplified listing of the amount of pure alcohol on labels or advertising.

My chief concern is in how the amount of alcohol in a product should be communicated. While I support the long-standing policy of using the percent of alcohol by volume, or proof, as the best way to describe alcohol content, I believe communicating alcohol content in a "standard serving" context would be misleading and would hinder, rather than promote responsible drinking. As you know, there is a significant difference in strength, concentration and effect between hard liquor, wine and beer. Continuing the current meaningful measure of the percentage of alcohol by volume is in the best interests of consumers and the public.

Further, I don't believe a "standard serving" measurement will be useful in regards to hard liquor and wine. As you know, most mixed drinks and wines served by-the glass are hand-poured, meaning there are significant variations in the serving size. Additionally, many "measured-pour" systems vary widely in terms of actual ounces poured per beverage.

Finally, state law and regulation will be negatively impacted by an effort to allow absolute alcohol per serving information on a label. Labeling the percentage of alcohol is the proper policy. Thus, changes in this area could put companies at risk of violating state laws.

I ask that you do not support this effort. Thank you.

Respectfully,



Rep. Robbie Wills