

ROY BLUNT
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Mr. John Manfreda
Administrator
Alcohol and Tobacco Tax and Trade Bureau
Attention: Notice #41
P.O. Box 14412
Washington, D.C. 20044-4412

Dear Administrator Manfreda:

Consumers deserve a labeling regime on the food and beverages they purchase that is as clear, honest and transparent as possible. It is the TTB's responsibility to ensure that integrity and sound science drive the policy decisions concerning any changes in the way such products are labeled.

For that reason, I write you today to urge the TTB to reject any changes to the existing labeling regime that would allow for the suggestion that a "standard drink" of alcohol exists. The bottom line is that there is no such thing as a standard drink, and any label information or graphics suggesting the contrary would be misleading.

The percentage of alcohol in beer or wine is generally understood. These drinks are not usually mixed and have a relatively low alcohol content. Distilled liquor, on the other hand, comes with a wide disparity in alcohol content from bottle to bottle and brand to brand. When mixed, it is extremely difficult for the consumer to make simple assumptions about how much alcohol is actually in the drink. Unlike beer and wine, distilled spirits are also routinely mixed with other forms of distilled spirits, creating a drink that may contain radically different amounts of alcohol depending on the server.

Given the great variances that can exist in the amounts and proofs of alcohol contained in drinks, I also urge the TTB to carefully examine any potential changes to the existing method of indicating alcohol content. It seems clear that measuring percent of alcohol by volume is the most accurate way to describe alcohol content on labels. This approach is consistent with the FDA policy governing labels on juices and other drinks, and is widely understood by consumers. This method also remains accurate regardless of the amount

of the serving, thus making it easier for consumers to understand the relative strength of a particular alcohol beverage.

Simplifying consumer information is generally a good thing, but it should not come at the expense of clarity and it should not create a significant risk of misinterpretation. I appreciate your consideration of my concerns, and commend the TTB for its continued efforts on behalf of consumers.

Sincerely,



Roy Blunt
Member of Congress



Eric Cantor
Member of Congress