



James T. Rausson

State Representative 25th House District

Representatives

July 14, 2005

John J. Manfreda  
Administrator  
Alcohol and Tobacco Tax and Trade Bureau  
US Treasury Department  
ATTN: Notice No. 41  
P.O. Box 14412  
Washington DC 20044-4412

Dear Mr. Manfreda:

Current federal alcohol beverage label regulations do not allow most beer, wine and distilled spirits companies to provide information about their products so that consumers can make informed choices about what to drink and how much to drink. The TTB is to be commended for seeking public comment on this proposed change in regulations.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic information on the label. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide this type of information on the label. I feel that the TTB should allow labels to voluntarily list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving.

Of all this information, the amount of alcohol per serving would be the most beneficial for consumers to have.

The U.S. government's advice on moderate drinking, as provided in *Dietary Guidelines for Americans* (USDA & HHS, 2005) reads:

The majority of American adults consume alcohol. Those who do so should drink alcoholic beverages in moderation. Moderation is defined as the consumption of up to one drink per day for women and up to two drinks per day for men. Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation. (p.44)

Allowing placement of information on alcohol per serving and servings per container on the labels of beer, wine and distilled spirits will help consumers to better understand the government's advice. In fact, given the wide variety of formulations, container sizes and alcohol concentrations in today's products, and the regulatory disparities as to what information may be placed on beer, wine and distilled spirits labels, some consumers might welcome more information about how particular products relate to

Committees:

Capitol:  
77 South High Street  
Columbus, Ohio 43215-6111  
(614) 466-8120, (614) 644-9494 (fax)  
(800) 282-0253 (toll free)

Health- *Vice Chair* • Aging Subcommittee of Health- *Chair*  
Insurance • Public Utilities • Economic Development & Environment  
[www.house.state.oh.us](http://www.house.state.oh.us)  
District28@ohr.state.oh.us


District:  
Parts of Hamilton County  
661 Park Avenue, Cincinnati, Ohio 45246  
(513) 674-7281  
(513) 674-7281 (fax)

the *Guidelines'* advice. Consumer serving facts will be more meaningful if the TTB makes clear in rulemaking what constitutes a `serving'. This is the essential fact that will allow consumers to make more informed comparisons between products and better understand what is in a standard serving of any alcoholic beverage.

The standard serving definition used in the *Dietary Guidelines* is one widely used by U.S. government agencies, public health groups, consumer groups, and a majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

I urge the TTB to act expeditiously to promulgate a regulation that permits meaningful consumer-oriented serving facts on beer, wine, and spirits labels. Meanwhile, I urge the TTB to allow manufacturers to provide this kind of truthful information on labels while the rulemaking process proceeds.

Sincerely,



James Raussen  
State Representative  
28<sup>x</sup> House District

JR/hb