



*Submitted electronically via regulations.gov*

October 30, 2019  
Director, Revenue & Rulings Division  
Alcohol and Tobacco Tax and Trade Bureau  
1310 G St., NW, Box 12  
Washington DC 20005

**RE: Elimination of Certain Standards of Fill for Distilled Spirits;  
Amendment of Malt Beverage Net Contents Labeling Regulation,  
Docket No. TTB-2019-0005**

The National Consumers League (NCL) is writing in response to TTB's proposed rule to eliminate most standards of fill for distilled spirits.

NCL is a private, nonprofit advocacy group representing consumers on marketplace and workplace issues and is the nation's oldest consumer organization.

NCL has long been urging TTB to take into account adult consumers' interest in having access to clear, usable and meaningful information about the alcohol beverages they consume. Most recently, for instance, along with several other consumer and public health advocacy groups, we wrote TTB to urge that its effort to "modernize" alcohol beverage labeling and advertising should include mandatory serving facts labeling so that consumers may understand how much alcohol, as well as nutritional content, they consume in a serving and in a given container.<sup>1</sup>

We believe adoption of the proposal to eliminate most of the standards of fill for distilled spirits has great potential to harm consumers by damaging the common understanding of container sizes, which consumers have come to rely on since the end of Prohibition. Eliminating most standards of fill for distilled spirits would also have the effect of making consumers' product comparisons at the point of purchase much more difficult. We also

---

<sup>1</sup> <https://www.regulations.gov/document?D=TTB-2018-0007-0074>

object to the proposal because of the danger that unscrupulous suppliers will engage in deceptive conduct by varying container sizes in an effort to increase profits.

One of TTB's principal missions is to minimize consumer confusion so that they have a sound understanding of the quality and quantity of alcohol beverage products. This proposal does not advance TTB's mission, in our view.

Thank you for considering our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg". The signature is written in a cursive style with a long, sweeping underline.

Sally Greenberg  
Executive Director