

Via the Federal e-Rulemaking Portal

Alcohol and Tobacco Tax and Trade Bureau
Attn: Amy Greenberg
Director, Regulations and Rulings Division
1310 G Street NW, Box 12
Washington, DC 20005

Re: **Request for Information; Docket No. TTB-2021-0007; Notice No. 204**
Promoting Competition in the Beer Market

Dear Director Greenberg,

We write as leaders of forty-seven state trade associations and that of the District of Columbia representing the interests of the small and independent breweries in our respective states. We wish to notify the Alcohol and Tobacco Tax and Trade Bureau that we agree with the comments filed by the Brewers Association in response to Notice 204.

All of our associations' members have experienced firsthand the difficulty in getting their products carried and sold in certain venues due to exclusionary trade practices. Even in the wake of greater TTB enforcement during the past six years, our members' products are typically under-represented in large chain accounts and in major sports and entertainment venues. We urge TTB to do more to ensure that retailers select the beers they buy and resell based on legitimate factors, and not because they have agreed to take money or other things of value from a beer supplier or wholesaler.

We also understand how restrictive and unfair state laws burden our members. While each state has adopted different laws, too many states restrict competition by prohibiting or limiting a brewer's ability to sell to retailers, locking brewers into unfavorable distribution relationships, restricting consumers' ability to purchase beer directly from a brewery, and mandating exclusive territorial appointments. These laws exacerbate the effects of wholesaler consolidation, so that today our members usually have just two choices for broad distribution in a given geographic territory. Constricted distribution channels also give enormous competitive advantages to the largest beer suppliers, who use distribution as a choke point to give their products in new competitive segments outsized access to the market.

Finally, we support the Brewers Association's request that TTB move forward expeditiously with many sensible regulatory clarifications and modernizations to reflect the current state of the brewing industry.

We thank you for your time and attention to these important matters.

Sincerely,



Jim Perkins, Executive Director
Alabama Brewers Guild



Lee Ellis, Board President
Brewer's Guild of Alaska



Rob Fullmer, Executive Director
Arizona Craft Brewers Guild



Sylvia Blain, Executive Director
Arkansas Brewers Guild



Shawnee Adelson, Executive Director
Colorado Brewers Guild



Phil Pappas, Executive Director
Connecticut Brewers Guild



Kim Willson, Executive Director
Delaware Brewers Guild




Kimberly Bender, Interim Executive Director
DC Brewers' Guild



Sean Nordquist, Executive Director
Florida Brewers Guild



Joseph Cortes, Executive Director
Georgia Craft Brewers Guild



Garrett Marrero, President
Hawaiian Craft Brewers Guild



Sheila Francis, Executive Director
Idaho Brewers United



Danielle D'Alessandro, Executive Director
Illinois Craft Brewers Guild



Kaitlyn Hendricks, Executive Director
Brewers of Indiana Guild



Noreen Otto, Executive Director
Iowa Brewers Guild



Derek Selznick, Executive Director
Kentucky Guild of Brewers



Cary Koch, Executive Director
Louisiana Craft Brewers Guild



Sean Sullivan, Executive Director
Maine Brewers' Guild



Kevin Atticks, Executive Director
Brewers Association of Maryland



Katie Stinchon, Executive Director
Massachusetts Brewers Guild



Lauren Bennett McGinty, Executive Director
Minnesota Craft Brewers Guild



Emily Curry, President
Mississippi Brewer's Guild



Sherry Wohlgemuth, Executive Director
Missouri Craft Brewers Guild



Matt Leow, Executive Director
Montana Brewers Association



Brianne Schuler, Executive Director
Nebraska Craft Brewers Guild



Wyndee Forrest, President
Nevada Craft Brewers Association



CJ Haines, Executive Director
New Hampshire Brewers Association



Eric Orlando, Executive Director
Brewers Guild of New Jersey



Jay Mahoney, President
New Jersey Brewers Association



Leah Black, Executive Director
New Mexico Brewers Guild



Paul Leone, Executive Director
New York State Brewers Association



Richard J. Greene, Executive Director
North Carolina Craft Brewers Guild



Angie Pelton, President
North Dakota Brewers Guild



Mary MacDonald, Executive Director
Ohio Craft Brewers Association



Tabbi Burwell, Executive Director
Oklahoma Craft Brewers Association



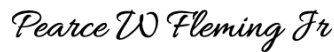
Christina LaRue, Executive Director
Oregon Brewers Guild



Fred Maier, President
Brewers of Pennsylvania



Gary Richardson, Executive Director
Rhode Island Brewers Guild



Pearce W. Fleming, Jr., President
South Carolina Brewers Guild



Scott Heckel, President
South Dakota Craft Brewers Guild



Sharon Cheek, Executive Director
Tennessee Craft Brewers Guild



Charles Vallhonrat, Executive Director
Texas Craft Brewers Guild



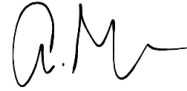
Mark Medura, President
Utah Brewers Guild




Melissa Corbin, Executive Director
Vermont Brewers Association



Brett Vassey, President & CEO
Virginia Craft Brewers Guild



Annie McGrath, Executive Director
Washington Brewers Guild



Mark Garthwaite, Executive Director
Wisconsin Brewers Guild



Michelle R. Forster, Executive Director
Wyoming Craft Brewers Guild