

June 22, 1998

R. Norman Cramer, Jr.
Assistant General Counsel
COORS BREWING COMPANY
Golden, CO 80401-1795

RE: 10th Anniversary Digital Postcard Tour

Dear Mr. Cramer:

ISSUE: This office is in receipt of your facsimile transmittal dated May 22, 1998 in which you request approval of the Coor's 10th Anniversary Digital Postcard Tour. Coors would like to make available to its distributors a program wherein they would bring digital photo equipment to accounts where photo postcards are taken of customers and given free of charge. The four-color postcards would bear your name and anniversary logo on both the "photograph" side, as well as on the reverse "postcard" side. Additionally, you would like permission to take a digital photo of the account staff either holding your products or clustered around one of your displays, which would be converted into a 15" x 22" transparency that could be used in accounts' existing light boxes.

OPINION: Section 493(24) of the Liquor Code [47 P. S. §4-493(24)] prohibits any manufacturer from offering or giving or soliciting or receiving anything of value as a premium or present to induce directly the purchase of liquor or malt or brewed beverages or for any manufacturer to offer or give to trade or consumer buyers any prize, premium, gift or other inducement to purchase liquor or malt or brewed beverages, except advertising novelties with a wholesale cost of \$15.00 or less each. [Advisory Notice No. 10 (Fourth Revision)]. As the photo postcards fit the definition of advertising novelties, Coors may distribute them to trade or consumer buyers.

With regard to the 15" x 22" transparency depicting account staff, be advised that Coors may supply such point-of-sale advertising to distributors as long as the total display area of the sign advertising Coors products does not exceed 600 square inches and for window or door display the total cost of all point-of-sale advertising matter related to the Coors brand does not exceed \$140.00 at any one time, with no single piece of advertising exceeding the cost of \$70.00

THIS OPINION APPLIES ONLY TO THE FACTUAL SITUATION DESCRIBED HEREIN AND DOES NOT INSULATE THE LICENSEE OR OTHERS FROM CONSEQUENCES OF CONDUCT OCCURRING PRIOR TO ITS ISSUANCE. THE PROPRIETY OF THE PROPOSED CONDUCT HAS BEEN ADDRESSED ONLY UNDER THE LIQUOR CODE AND REGULATIONS. THE LAWS AND POLICIES ON WHICH THIS OPINION IS BASED ARE

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SUBJECT TO CHANGE BY THE LEGISLATURE OR THE PENNSYLVANIA LIQUOR
CONTROL BOARD.

Very truly yours,

FAITH S. DIEHL
CHIEF COUNSEL

cc: Pennsylvania State Police-
Bureau of Liquor Control Enforcement

Refer to: (717) 783-9454
FAX: (717) 787-8820

LCB Advisory Opinion No. 98-204