

January 8, 2013  
To: FBWA Members  
From: Mitch Rubin

RE: Furnishing Coupons and IRCs

Issue: Whether a distributor of beer may furnish coupons or IRCs redeemable by vendors?

Brief Answer: No. Distributors of beer are expressly prohibited from participating in the furnishing of coupons or IRCs that are redeemable by vendors.

Analysis: Section 561.42 (12) (e), Florida Statutes, expressly prohibits distributors from participating in the furnishing of manufacturer coupons. It provides:

Coupons redeemable by vendors shall not be furnished by distributors of beer to consumers.

Conclusion: Distributors of beer are prohibited from participating in the funding of coupons and IRCs that are redeemable by vendors.