



WINE INSTITUTE

ROBERT P. KOCH
PRESIDENT AND CHIEF EXECUTIVE OFFICER

August 29, 2006

Mr. Francis W. Foote
Director, Regulations and Rulings Division
Tax and Trade Bureau
1310 G Street, N.W., Room 200E
Washington, D.C. 20220

**Re: Notice No. 62 – NPRM: Major Food Allergen Labeling for
Wines, Distilled Spirits, and Malt Beverages**

Dear Mr. Foote:

Wine Institute, the public policy advocacy association representing 928 California wineries and affiliated businesses responsible for 85 percent of the nation's wine production and more than 90 percent of U.S. wine exports, joins with the Distilled Spirits Council of the United States in supporting the request by the National Association of Beverage Importers for an extension of the comment period in Notice No. 62, the proposed rulemaking regarding allergen labeling for wines, distilled spirits, and malt beverages. However, Wine Institute requests an additional 120 days to the current comment period which is currently due to end on September 25, 2006.

We agree with NABI and DISCUS that the proposed rulemaking is complex and far-reaching, and that additional time is required to reach and have interested parties participate in the comment period. With regard to our membership, the next several months are among the busiest months of the year. With the approaching harvest almost upon California vintners, our members face long hours in their rush first to bring the grape crop from the field to the winery, and then to process the harvest into their award-winning products. During harvest, it is difficult for our members to find the time to focus on the complexities of the proposed rule. We therefore believe that a 120-day extension is appropriate and necessary.

We would be pleased to respond to any questions that you might have concerning this request.

Very truly yours,

Robert P. Koch

RPK:kc