August 2, 2005 Comment 36

Via Certified Mail

William Foster, Chief Regulations and Procedures Division Alcohol and Tobacco Tax and Trade Bureau P. O. Box 14412 Washington, DC 20044-44

Re: TTB Notice No. 49 Proposed Change to Vintage Date Requirements

Dear Mr. Foster,

I would like to go on record that Rutherford Hill Winery (Napa County), Chimney Rock Winery (Napa Valley, Stags Leap District), Alderbrook Winery (Sonoma County, Dry Creek) and Sanford Winery (Santa Barbara County, Santa Rita Hills) are diametrically opposed to the proposed change to the vintage dating regulations that would allow the standards to be reduced from 95% to 85% of "in vintage" wine.

In fact, it is my considered opinion we should not reduce our standards in America's most prominent viticultural areas for *any* reason, most emphatically *not* in the interest of competing with countries that are focused on the volume of cases they produce rather than the quality.

We should continue using our energy and resources to not just maintain the standards, but to raise them when possible to protect the integrity of our wines, so that in the coming decades we can be recognized as the finest wine growing appellations in the world.

Over the last 30 years we have come a long way. The image and prestige of our appellations has grown dramatically, and most of the credit should go to those dedicated producers that placed quality first, through their efforts today we are the envy of wine producers from all over the world.

Why denigrate the celebrated appellations of Napa County, Sonoma County and Santa Barbara County that are revered throughout the wine world to benefit wineries where cases not quality is the focus?

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The Wine Institute presents the proposed new regulation as a "compromise." It says the proposal protects names such as "Napa Valley" by keeping the 95 percent requirement in place for such appellations of origin, only the standard for Napa County would fall to 85 percent. Whether this argument is naive or misinformed, I do not know; but in any case it is wrong. How many consumers will make the distinction between Napa Valley and Napa County? Further, if this new regulation goes through, the news headline read throughout the wine world will be that the U. S. wine industry has lowered its standards. All producers, large and small, will suffer as a result.

Our focus at this time should be to take advantage of the opportunities to improve our wines and image in the global arena. Let us not be dragged down by compromise to commercialism, there is enough ordinary wine in the world; our wines should be the wines all others aspire to be.

This becomes improbable if we allow lower standards ...it's nonsense to say the concept that blending 10% more of another vintage......will improve the overall quality of our wines. From my point of view, this is a blatant effort to stretch "good" vintages with "off' vintages. It is my belief that everyone dedicated to quality will also oppose the compromise, and keep high standards as the rule of conduct; it will be to the benefit of all of us.

I respectfully urge you to deny the Wine Institute's petition to change the Vintage Date Rules.

Siperely,

Anthony J. Terlato