

McMANIS

FAMILY VINEYARDS

COMMENT 51

August 1, 2005

Mr. John Manfreda, Administrator
Alcohol & Tobacco Tax and Trade Bureau
U.S Treasury
1310 G Street, NW
Washington D.C. 20220

Re: TTB Notice 49 - Petition to amend 27 CFR, sec. 4.27 (vintage date regulations)

Dear Administrator Manfreda,

As the owner of a small and growing business I take pride in my contributions to America's economy. Here at McManis Family Vineyards we are third-generation growers, farming 1,200 acres of wine grapes and planning to crush over 18,000 tons at our winery in Ripon, California this fall. We have successfully launched a brand and are gaining recognition in the marketplace for our value priced California Appellation (\$10) wines. We have taken the position of offering the consumer a high quality product at a fair price. We work hard and we work smart. We do not seek a tax relief or the imposition of trade barriers on foreign wines. We are prepared to meet the foreign competition head on in the U.S. and in export markets and we are prepared to compete on both price and quality. All we ask for from our government is to maintain a level playing field between us and our foreign competition.

As you know, we do not currently have a level playing field in the matter of vintage dating. According to their own laws, most of our competition can blend between 15% and 25% from another vintage and still can use the vintage of the remaining 85% to 75% on the label. This allows them an artificial quality advantage because they can soften young red wine with some aged wine and can freshen up older white blends with fruity young wine.



Theoretically, these countries should comply with U.S. law when they import their wine into the U.S. Practically, it is not reasonable to expect that the U.S. government is going to be able to reliably confirm that wineries in Argentina or Romania or Languedoc are observing U.S. law when they assemble their blends. The only practical way to level the playing field is to change U.S. vintage dating laws to the 85% requirement that prevails in most of the world. I do want to reiterate that this change to the world standard is not just an economic necessity for U.S. producers but will also serve consumers by enabling U.S. producers to improve the quality of their wine blends.

It is our understanding that the Tax and Trade Bureau is currently considering public comment regarding TTB Notice 49, an amendment to "27 CFR, sec. 4.27", regarding vintage date regulations and requirements for wine labeling in the United States. We support the Wine Institutes efforts to change the vintage date requirement to 85%, and encourage you to look favorably upon the Wine Institute's petition.

California has high land, labor and regulatory costs. In order to be competitive, we must continue to leverage our wonderful climate and soils with a commitment to quality and creativity. In order to do our best, we need the flexibility to improve our wines by blending in accordance with world standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron McManis", is written over a light-colored rectangular background.

Ron McManis, President
McManis Family Vineyards Inc