



WINE INSTITUTE
THE VOICE FOR CALIFORNIA WINE

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JOHN A. DE LUCA
PRESIDENT & CEO

March 26, 2003

Mr. Arthur J. Libertucci
Administrator
Tax and Trade Bureau
U. S. Treasury
650 Massachusetts Avenue, NW
Washington, D.C. 20226

FAXED

Re: **Organic Claims in Labeling and Advertising of
Alcohol Beverages (2002R-288P)**
Notice No. 964; Ref: T.D. ATF-483, Notice No. 954

Dear Mr. Libertucci:

Wine Institute, the public policy association representing over 637 California winery and associate members and 90% of the volume of wine produced in California, requests an additional 45-day extension of the comment period scheduled to end on March 27, 2003 regarding the proposal to finalize temporary regulations published in T.D. ATF-483 (67 FR 62856) that amend labeling and advertising regulations to cross-reference the United States Department of Agriculture's (USDA) National Organic Program (NOP) rules.

Wine Institute acknowledges and appreciates TTB's active cooperation with USDA representatives in deploying the nationwide standards embodied in the National Organic Program rules and regulations. We would like additional time to work with USDA representatives on issues that deal primarily with the labeling aspects of the organic standards as they apply to wine.

As stated in our original extension request of December 4, 2002, we note that the temporary regulations have already taken effect on October 21, 2002 and the "stream of commerce" interpretation do not present circumstances where the comment period must be closed. We therefore respectfully request this extension because we want the opportunity to provide our members with information and TTB with comments that are relevant and useful to the implementation of the NOP.

As always, we would be glad to respond to any questions you may have to this request.

Sincerely,

John A. De Luca
President & CEO

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