

ISC OF CALIFORNIA, INC.
601 FOURTH STREET
SAN FRANCISCO, CALIFORNIA 94107
PHONE: 415/777-6837, 6839

RECEIVED
8/12/83
Sinterman

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August 10, 1983

Bureau of Alcohol, Tobacco & Firearms
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20226

Attention: Chief, FAA, Beer & Wine Branch

Re: Notice #472
Northern Sonoma Viticultural Area

Dear Sir:

We are currently involved in negotiations with Heublein Wines for the purchase of a number of brands which they currently own and produce, as well as several of their wineries, including one in Northern Sonoma (Asti).

Because of numerous other pressing issues involving these negotiations we have not been able to devote as much time as we would have liked to the review of Notice #472. However, we would like to submit a few brief comments.

First, we support the petitioner's proposal for the establishment of a Northern Sonoma viticultural appellation. The area certainly has a plethora of history, and speaking for ourselves, we plan to actively publicize the history behind the Italian Swiss Colony Winery.

We are not in favor of cutting the size of the area. Although the industry is not growing as rapidly as in past years, we feel it is just a matter of time before the industry expands again. By designating a larger area, potential problems due to expanding acreage not being included in the designated viticultural area, can be avoided.

On the face of it, it seems to us that there is sufficient evidence that the designation, "Northern Sonoma" applies to the proposed area.

Bureau of Alcohol, Tobacco & Firearms
August 10, 1983

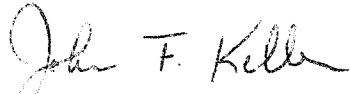
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We do not see why any consumer confusion should result if the proposal is approved. Knowledgeable consumers will know what the area is. And, in all probability, those who don't know won't care.

As far as overlapping areas, or including smaller areas within larger ones, we do not see this as a problem and do not believe any consumer confusion will result.

Very truly yours,

ISC WINES OF CALIFORNIA, INC.

A handwritten signature in cursive script that reads "John F. Keller". The signature is written in dark ink and is positioned above the typed name and title.

John F. Keller
President

JFK/jo

Received
8/12/83
Randy

(2)

Heublein Wines
601 Fourth Street San Francisco California 94107 (415) 777 6500



August 10, 1983

Bureau of Alcohol, Tobacco & Firearms
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20226

Attn: Chief, FAA, Beer & Wine Branch

Re: Notice #472
Northern Sonoma Viticultural Area

Dear Sir:

This is to send our support to the proposed Northern Sonoma viticultural area as set out in Notice #472.

In general, we feel that if the criteria for distinguishing viticultural features of an area are met, size alone should not be a factor. In effect, if the consumer reads "North Coast" or "Northern" Sonoma" on his label he knows that wine was produced in that locale. However, if he reads "Chalk Hill" or "Alexander Valley" then he has the benefit of an even more restrictive area in which the grapes were grown and his wine was produced.

It is for this reason that we see no objection to larger areas which may in turn encompass one or more smaller divisions each with its own distinctive designation. By the same token, if the consumer is at all familiar with the geographical area designation, we do not believe there will be any confusion.

Very truly yours,

HEUBLEIN WINES

A handwritten signature in blue ink that reads "Mary J. Kramer".

Mary J. Kramer
Director, Legal Compliance

MJK/jo