

ROBERT KARL

September 19, 2005

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
P.O.Box 14412
Washington, DC 20044-4412

RE: Notice No. 41

To whom it may concern:

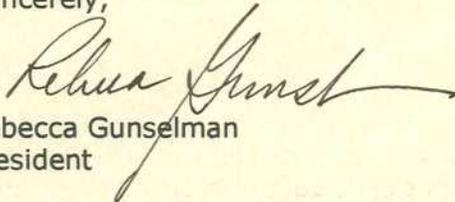
I understand the need and convenience of labeling most grocery items with ingredient and allergen information but I do not feel wine should be included in the newly proposed ruling. No new information will be added and label changes are costly.

Wine is a natural product; it is made from grapes. Other than SO₂; which is already on the label and may be omitted, there are no added preservatives. SO₂ occurs naturally due to fermentation. The percentage of alcohol is stated on the label so the caloric value is easily calculated. A red table wine, by definition, may not contain sugar. We are not aware of any reported cases of allergies to wine. In a nut shell all the pertinent information about wine is already on the label.

We are a small family owned and operated winery producing about 2,500 cases of wine. The proposed ruling to include ingredient and allergen labeling would create a hardship. We used a designer to develop our label. Any changes in labeling requirements would necessitate a new design. Additionally, our printer developed a plate for our original label. A new label would entail new plates and a new set-up with the associated fees.

It seems unnecessary to incur the expense of changing labels on wine when informative guidelines for labeling already exist.

Sincerely,



Rebecca Gunselman
President

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