



Mr. Frank Foote  
Director, Regulations and Rulings Division  
Alcohol Tobacco Tax and Trade Bureau  
P.O. Box 14412  
Washington, DC 20044-4412

February 26, 2008

Dear Mr. Foote,

As a winemaker who has worked in Napa Valley for over 27 years, I am writing to ask that the TTB **withdraw** proposals, NPRM #77 and #78.

Consumers are faced with many decisions when they make a wine purchase; vintage, varietal, appellation, brand and so forth. Many consumers often identify a wine's quality and characteristics with a geographical location, whether it be larger, such as California or smaller such as Napa Valley or even smaller, for example, Rutherford. Their perception of quality and particular characteristics of an individual wine is tied to the appellation from which that wine originates. People tend to focus on brand names, particularly since that is usually what appears in the largest type on the label and is generally what they use to identify a wine when they are ordering it in a restaurant. I think that if a consumer were to see a geographical brand name on the label they would generally assume that the wine was made from grapes from that region and therefore had certain characteristics. Allowing wine brands to have geographical brand names when that name is inconsistent with where the grapes come from, for example Rutherford Cellars making a Cabernet from Lodi grapes, could lead to a tremendous amount of consumer confusion. In addition it could lead to deception by unscrupulous producers trying to pass off lesser quality wines, using a well known area as a geographical brand name.

In my experience, grapes from different areas produce wines with distinctive characteristics that consumers identify and expect from these wines. These areas sometimes almost become like brands themselves and in the interest of presenting the consumer with clear reliable information, it is important that if a geographical brand name is used, that it reflects that the grapes used to make that wine came from that region. NPRM #77 and #78 would compromise the consumer's ability to get clear, accurate information.

Respectfully,

Kristin Belair  
Winemaker

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