



BRONCO WINE COMPANY

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Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 49
P.O. Box 14412
Washington, DC 20044-4412

Via Fax: (202) 927-8525
Via E-Mail: nprm@ttb.gov

Re: Proposed Change to Vintage Date Requirements, Notice No. 49

Dear Sir/Madam:

Bronco Wine Company of Ceres, California, submits the following comments in support of the proposed change to the current vintage date requirements set forth in 27 C.F.R. § 4.27.

It is our understanding that the Tax & Trade Bureau (TTB) is considering changing the current 95% vintage date requirement to an 85% requirement for wines bearing a state, multi-state, county or multi-county appellation of origin, but that the 95% requirement would remain unchanged for wines labeled with a viticultural area appellation of origin. Bronco Wine Company strongly supports the proposed change.

Bronco Wine Company is committed to producing very high quality wines at prices affordable to most consumers. We believe we have been successful in reaching that objective and, as a result, consumers have confidence in our brands. One of the most important elements in maintaining that confidence and brand loyalty is product consistency. The consumer expects each new bottle of a given brand of wine to taste exactly the same as the last one he or she drank. Maintaining that consistency from vintage to vintage is challenging for any winery, and perhaps more challenging for wineries that produce large quantities of wine sourced from a number of vineyards. Variations from vineyard to vineyard and vintage to vintage set the stage for variations in the flavor profile of the finished product. The proposed change to an 85% vintage date requirement would provide Bronco Wine Company with greater latitude to blend wine from different vintages and maintain a consistent flavor profile from year to year and bottle to bottle. This would inevitably lead to greater numbers of satisfied wine consumers and a healthy U.S. wine market.

We are aware that a great many of the world's wine producers (and exporters to the United States) currently adhere to the 85% vintage standard being proposed. Therefore, there can be little doubt that the wine imported into the U.S. from those countries is reflective of the 85% standard, notwithstanding the requirements of 27 C.F.R. § 4.27. As a result, U.S. wineries are at a competitive disadvantage. Wineries from Australia, New Zealand and the European Union member states, to name just a few, are free to produce their products under the 85% standard while U.S. wineries are not. This

dichotomy affords those that compete with the U.S. wine industry greater latitude in production and, as explained in the proposal submitted by Wine Institute, enables them to obtain efficiency in cooperage because less storage is required for older vintage remnants. We believe that U.S. law should not disadvantage U.S. wineries but should facilitate fair competition and consistent legal requirements.

In summary, Bronco Wine Company believes that the U.S. wine industry will benefit from the proposed vintage requirement change. U.S. wineries will be able to compete on equal footing with foreign wine producers and can produce their products with greater efficiency. Consumers, in turn, will get the benefit of greater consistency in the taste profiles of their wines and prices that reflect the increased production efficiencies at the winery. For these reasons, Bronco Wine Company is strongly in favor of the proposed change in vintage date requirements.

Respectfully submitted,
Bronco Wine Company

By: 
Daniel J. Leonard, Treasurer

djl:pj