



NATIONAL ASSOCIATION OF BEVERAGE IMPORTERS, INC.

Comment 18

932 HUNGERFORD DRIVE • SUITE 12A • ROCKVILLE, MD 20850
TELEPHONE (240) 453-9998 • FAX (240) 453-9358

June 2, 2005

William Foster, Chief
Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street, N.W.
Washington, DC 20220

RE: Notice No. 41 (ANPRM) — Labeling and Advertising of Wine,
Distilled Spirits and Malt Beverages; Request for Public
Comment

Dear Mr. Foster:

The National Association of Beverage Importers, Inc. is respectfully requesting the Alcohol and Tobacco Tax and Trade Bureau (TTB) to formally extend the comment period for ANPRM Notice No. 41 another 60-90 days.

You have asked many questions in the ANPRM, some of which are very broad and far reaching from a policy stand point. Others are very technical and require a great deal of research and coordination with our foreign suppliers. Consultation with our foreign suppliers is a key component of any response we give to your many questions. Some of your questions require discussions/decisions at the very highest level of our member companies. All of the actions I have outlined take time.

We have been working on our response for almost 30 days and have come to the conclusion that we will not be able to meet your June 28, 2005 closing date for your public comment period.

If you want meaningful and substantive responses to your questions, we must have more time.

ROBERT J. MAXWELL
PRESIDENT

WINE-SPIRITS-BEER
beverageimporters@nabs-inc.org

BERNADEEN P. EMAMALI
VICE PRESIDENT, ASSISTANT TREASURER &
CORPORATE SECRETARY

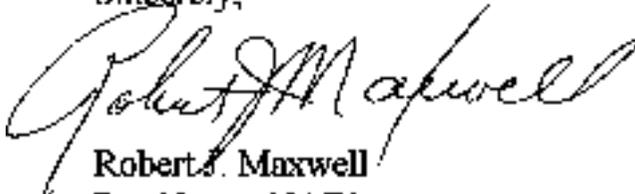
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The NABI governing body, the Board of Directors, will not meet again until late July. The Board must approve any comment submitted to TTB in NABI's name. I am sure you can appreciate how difficult it is to bring a large body of high level company officials to a board meeting in New York City. The demands on their time are many and the rescheduling of their July meeting is impossible.

Giving us the additional time we are requesting will result in a much better and more detailed response to your questions. Our responses will have been vetted through the expert committees of NABI and to the extent possible coordinated with other associations both in the U.S. and within our principal trading partners.

It appears to us that only the allergen labeling questions are driven by a statutory deadline. If necessary, they could be separated from this notice and dealt with in a different time line. We can see no harm done by giving all other issues raised in ANPRM Notice No. 41 an extended comment period.

Thank you for giving our request careful consideration. If you have any questions, please do not hesitate to call me.

Sincerely,

Robert J. Maxwell