



March 12, 2019

Ms. Amy Greenberg
Director, Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street NW
Box 12
Washington, DC 20005

BY ELECTRONIC SUBMISSION

American Craft Spirits Association Request for Extension on TTB Proposed Rulemaking
27 CFR Parts 4,5,7,14 and 19
Modernization of the Labeling and Advertising Regulations for Wine, Distilled Spirits and Malt Beverages
Docket No. TTB-2018-0007; Notice No. 176

Dear Ms. Greenberg,

The American Craft Spirits Association (ACSA), *the* national trade organization for craft spirits producers in the United States represents a young, burgeoning, and dynamic industry of well over 1800 small and independent distillers across the country. ACSA's principle mission is to elevate and advocate for our community of craft spirits producers, and as such we are engaged on an ambitious response to the reference proposed rulemaking.

The proposal is voluminous and far-reaching and impacts every disparate part of our industry. In order to ensure the most complete, qualified and helpful feedback, we respectfully request an extension on the current deadline of March 26th and would further suggest a new deadline of June 26th (or later).

ACSA is appreciative of the opportunity to participate in the rulemaking process and it is our goal that these rules, when final, will serve to simplify and clarify the regulations under which our members operate while maintain maximum flexibility for future growth and innovation – as well as to protect and better inform the consumer as to the nature and identity of all beverage alcohol products.

Thank you for the consideration.

Respectfully,

Mark Shilling, Chair
ACSA Legislative Committee