

## Kathy Sharp

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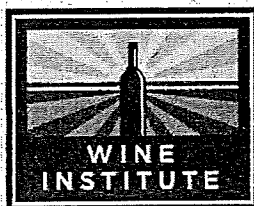
**From:** Tyler Rudd <trudd@wineinstitute.org>  
**Sent:** Sunday, January 07, 2018 1:34 PM  
**To:** Kathy Sharp  
**Cc:** Brian L.Nance (brian.nance@nance.net)  
**Subject:** Wine Institute letter on proposed rule changes  
**Attachments:** Letter to ABLE Commission on Proposed Rule Changes 2018.pdf

Dear Ms. Sharp,

On behalf of the Wine Institute, I would like to submit our written comments on the proposed rule changes to the alcohol regulations. Please find the letter attached.

Many thanks,

***Tyler Rudd***  
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January 7, 2018

Alcoholic Beverage Laws Enforcement Commission  
3812 N. Santa Fe  
Suite 200  
Oklahoma City, Oklahoma 73118

Attention: Kathy Sharp

Dear Director Burt and Commissioners,

Wine Institute is a public policy advocacy trade organization comprised of about 1000 California wineries and affiliated businesses. Wine Institute's mission is to initiate and advocate public policy that enhances the ability to responsibly produce, promote, and enjoy wine.

We appreciate the chance to comment on the proposed rule changes reflecting the changes in the Oklahoma alcohol laws that are forthcoming. Generally, we do not have many comments on the proposed changes. However, we do seek some clarification to a few of the proposed rules.

1. Currently, a salesperson for a manufacturer can physically handle the brands his/her company represents. Will there be rules allowing a salesperson to handle his/her brands in the new rules?
2. In the proposed rule 45:30-5-22, we assume that it applies only to beer manufacturers and beer distributors. If this is the case, for clarifying purposes, would you please add the word "beer" before "distributors" to avoid any confusion that this would apply to wine wholesaler agreements?
3. Proposed rule 45:25-5-5 deals with a direct wine consumer permit application. During the 2017 legislative session, House Bill 1540 by Rep. Virgin (signed by Gov. Fallin on 5/19/17) removed the requirement for consumers to obtain a Direct Wine Consumer Permit, so there is no longer a need for this proposed rule.

Again, thank you for the opportunity to submit our comments on the proposed rules. We are happy to discuss these further or answer any questions regarding our comments should they arise. I can be reached at [trudd@wineinstitute.org](mailto:trudd@wineinstitute.org) or at (512) 293-0247.

Many thanks,

Tyler Rudd  
Central States Counsel