



January 14, 2020

Ambassador Robert Lighthizer  
United States Trade Representative  
600 17<sup>th</sup> Street NW  
Washington, DC 20508

RE: Determination and Request for Comments Concerning Action Pursuant to Section 301: France's Digital Services Tax (Docket Number: USTR-2019-0009)

Dear Ambassador Lighthizer:

On behalf of the Wine Origins Alliance, thank you for the opportunity to provide post-hearing rebuttal comments on the proposed retaliation for the imposition of a Digital Services Tax (DST) by the Government of France.

The Wine Origins Alliance is composed of 28 organizations from 11 countries spanning North America, Europe, Australia, and Asia. Together, we represent nearly 80,000 wineries and grape growers that have generated more than 900,000 jobs and more than \$8 billion in global wine exports.

As we stated in our comment letter submitted January 6, 2020, we oppose all tariffs on wine as countermeasures in disputes between the United States and European Union, the two leading wine producers in the world with combined wine exports of \$28 billion in 2018. The proposed tariffs on wine, if imposed, would only lead to lost economic growth and lost jobs for the farmers, vintners, wineries, wholesalers, distributors, and retailers – many of them small businesses – that bring our distinctive wines to the tables of consumers in the U.S. and the EU.


At the hearing held on January 7 and 8, many individual participants in that supply chain testified to the negative impact on their companies from the proposed tariffs. We write in post-hearing comments to rebut a proposal offered during oral testimony to impose tariffs on only a certain segment of the wine market.

Wines cannot be distinguished in the Harmonized Tariff Schedule through price, volume, or label in a manner that would effectively limit the tariff impact to large suppliers. Many small wineries and brands offer wines at a variety of prices and sizes. Moreover, imposing the tariff on only the most popular wines would maximize the harm to American wholesalers, distributors, and retailers. And, last, making such a distinction would expose American wines to similar retaliation.

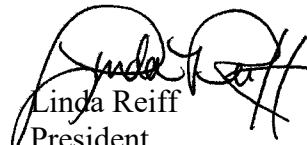
In conclusion, we reiterate our complete opposition to tariffs on wine, including if such tariffs are attempted to be levied on a segment of the wine market.

Thank you for your consideration of our position.

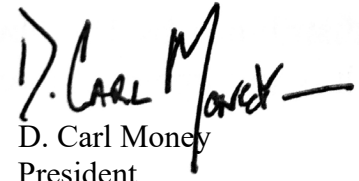
Sincerely,



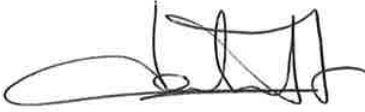
Jim Anderson  
Executive Director  
Missouri Wine and Grape  
Board




Linda Reiff  
President  
Napa Valley Vintners




D. Carl Money  
President  
Texas Wine Growers



Maxime Toubart  
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Comité Champagne



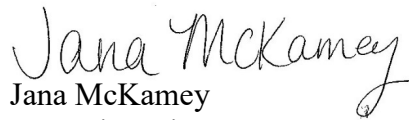
Kareem Massoud  
President  
Long Island Wine Council



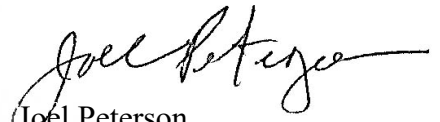
Alison Laslett  
President/CEO  
Santa Barbara County




Jean-Marie Barillere  
Co-President  
Comité Champagne




Jana McKamey  
Executive Director  
Oregon Winegrowers  
Association



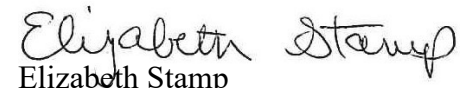
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Consejo Regulador del Vino de  
Jerez




Morgen McLaughlin  
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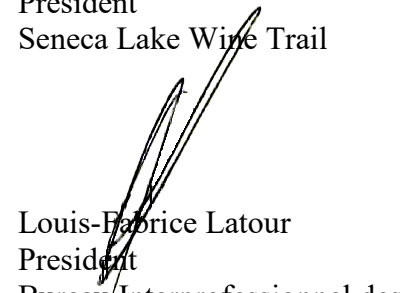
Elizabeth Stamp  
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Bernard Farges  
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Vin de Bordeaux



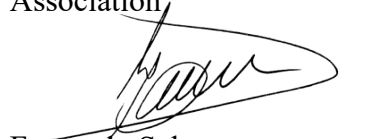
Shigekazu Misawa  
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Yamanashi Wineries  
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Louis-Fabrice Latour  
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Bureau Interprofessionnel des  
Vins de Bourgogne



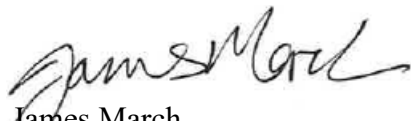
Michael Haney  
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