

Bill Cooper

Out of state winery

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Topic: License duration and on-line renewal: an out-of-state perspective

We are a small (2,000 case) out-of-state winery (California) that is licensed to direct ship to 35 other states, and Colorado is our 7th largest market although a small one on the scale of things with <\$4,000 in 2022 sales.

Of these states, two-year licenses have gradually increased to three (TX, NY, and most recently KS) presumably due to reduced workload cost efficiencies. Whether one-year license or two, over half the states license July-June or January-December. As a licensee, this is boon because we can do these renewal periods at one sitting and not worry about forgetting a state that uses a unique month to expire their license.

Almost all states use some form of online renewal process, and judging from the similarity of their platforms many appear to use the same/similar SaS portal.

In addition, other states are adjusting their sales tax reporting periods to be more cost effective for revenue received, i.e., from monthly to semi-annual or annual.

Finally, as a TTB-licensed, out-of-state producer, I cannot comment on your local enforcement issues and concerns, but we are vetted both at the federal level and by our home state and have too much at stake to cut corners with our direct shipping privileges.

Thank you for the opportunity to comment.