



## AT THE BAR WITH BOWDITCH

A Legal Blog for the Craft Brewing Community

### TTB Online Permit Upgrades Increase Turnaround Time

BY DONNA M. TRUEX • NOVEMBER 5, 2018

On July 31, 2018, after being shut down for about a week, the Alcohol and Tobacco Tax and Trade Bureau (“TTB”) launched an upgrade of its technology to v.5.0 of Permits Online. Now, applicants can and should link their previous paper application to their electronic account in order to make any amendments to them.

With the technology upgrade complete, it is supposed to make filing applications and amendments and their review more convenient, faster and easier. Prior to the upgrade, the TTB had shortened its turnaround time to under 30 days, however, post upgrade, the turnaround time has increased to nearly three months (82 days, according to the TTB website).

The increased turnaround time could be due to the heavy volume of filings, but having spoken to several TTB personnel, it appears that there are several kinks to the new system that need to be addressed. The first being that while filing is easier for the end user, it is apparently not the same for TTB investigators. Of particular note, is that any errors in or revisions required to any application cannot be fixed by the end user, putting the onus on the TTB investigator to manually make all changes on their end. Another issue is, because the new system is a complete overhaul, the training time and time to get up to speed using the new system for TTB personnel may have significantly slowed the process.

Apparently, the upgrade install and simultaneous training essentially shut the TTB down for nearly a week. This has set application review time back significantly. It is assumed that as the TTB works out the kinks and its personnel gets used to the new system, the application review time will come back down, but for now, we must exercise patience and set expectations for application review and approval accordingly.