



MEMORANDUM

TO: Bob Klein, Chair,
and Members of the Board

DATE: June 12, 2018

FROM: Erika McConnell, Director

RE: Proposed Regulations Change:
Deadline for Reinstatement and Renewal;
Renewals with Transfers

Statutory Authority: AS 04.06.100(a): “The board shall adopt regulations governing the manufacture, barter, sale, consumption, and possession of alcoholic beverages in the state that are consistent with this title and necessary to carry out the purpose of this title in a manner that will protect the public health, safety, and welfare.”

Status: Public comment period closed April 27, 2018

Deadline for Reinstatement and Renewal: A license expires if the licensee does not submit a complete renewal application by February 28 of the year after their two-year license period. 3 AAC 304.160(e) allows a licensee to request reinstatement by the board, but does not set a deadline for such a request. At times, the request is being made over a year after the license expired, which is unreasonable.

3 AAC 304.100(2) states that licenses become available “10 days after the period for renewing licenses has expired, where the license becomes available because a license has expired and has not been renewed.” This section, combined with an open-ended allowance for requesting reinstatement results in the potential for licenses to be issued over the population limits of AS 04.11.400.

If a licensee misses their renewal, their license becomes available 10 days after the expiration (on February 28 per AS 04.11.540). If that license is issued to someone else after it becomes available, but the original licensee requests reinstatement some months or a year later, what happens?

This proposal extends the time before a non-renewed license becomes available from 10 to 30 days, but then limits the period of time within which a licensee can request reinstatement to March 30, 30 days after the expiration date. It is appropriate to have a grace period for filing a renewal (above and beyond the first grace period between January 1 and February 28) to accommodate extreme circumstances, but an open-ended grace period is unreasonable and unfair to those licensees who comply with the deadlines in statute. Under this proposal, there would be five months between the date of first being notified of the requirement to renew (November 1 per AS 04.11.270(b)(1)) and the date the licensee would no longer be able to request reinstatement (March 30 of the following year).

Note that licensees are contacted twice before their license expires and once more at the time of license expiration, so the office is doing what it can to enable licensees to renew their licenses.

Renewals with Transfers: 3 AAC 304.175(e) states, “An application for the transfer of a liquor license received after October 1 of the year in which the license expires must be accompanied by an application to renew the liquor license.”

AS 04.11.270(b)(1) states, “on or before November 1, the director shall mail a renewal application to each licensee whose license, unless renewed, will expire on December 31 of that year.”

Renewal forms are personalized for each licensee and staff does not generally have the forms prepared until near the end of October. Staff suggests coordinating the date that renewals are due with transfer applications, with the date that renewal applications are mailed to licensees. This would change 3 AAC 304.175(e) from October 1 to November 1 as shown in the attached draft regulations change.

(Words in **boldface and underlined** indicate language being added; words [CAPITALIZED AND BRACKETED] indicate language being deleted.)

3 AAC 304.100 (2) is amended to read:

(2) **30** [10] days after the period for renewing licenses has expired, where the license becomes available because a license has expired and has not been renewed (Eff. 4/28/84, Register 90; am __/__/____, Register ____)

Authority: AS 04.06.080 AS 04.06.100 AS 04.11.400
AS 04.06.090 AS 04.11.340 AS 04.11.320

3 AAC 304.160(e) is amended to read:

(e) For the purposes of AS 04.11.540, if a license has expired for failure to file a complete application for renewal by February 28 or for failure to pay the required fees and penalty fees by that date, the board will consider a written request to reinstate the license if the request is **submitted by March 30 and** accompanied by

- (1) a complete application;
- (2) all required fees and penalty fees; and
- (3) proof of good cause for the failure to file and pay by February 28. (Eff. 9/11/98,

Register 147; am 6/13/2003, Register 166; am __/__/____, Register ____)

Authority: AS 04.06.090 AS 04.11.270 AS 04.11.680
AS 04.06.100 AS 04.11.540

3 AAC 304.175(e) is amended to read:

(e) An application for the transfer of a liquor license received after **November 1** [OCTOBER 1] of the year in which the license expires must be accompanied by an application to renew the liquor license. (Eff. 11/29/81, Register 80; am 4/28/84, Register 90; am 5/11/96, Register 138; am 8/24/2001, Register 159; am 6/13/2003, Register 166; am __/__/____, Register____)

Authority:	AS 04.06.090	AS 04.11.040	AS 04.11.360
	AS 04.06.100	AS 04.11.280	AS 04.11.400

From: Christy
To: [CED AMCO REGS \(CED sponsored\): Pete Hanson](#)
Subject: Comments on proposal for license obliteration if three months late
Date: Wednesday, April 11, 2018 8:56:57 PM

Dear AMCO Board,

Please do not support the proposed regulation to allow licenses to be taken away permanently if applications are three months late.

My husband and I own the Pioneer Bar and Bamboo Room Restaurant, which have been in my family for 65 years. We have always paid our license on time, until this year. In November 2017, I wrote the check, had it in the envelope ready to go out the door and forgot about it. After the first of the year, I kept wondering why we hadn't got a notice saying the AMCO Board received our application, let alone our permit, as I was sure I had mailed it. Then one day, I was clearing off some piles on a table in my kitchen and to my shock, found the sealed envelope with our application.

It was hard enough to come up with a \$500 late fee in the middle of a tough winter, but I can't imagine if my absent-mindedness had cost us our license. If we lost our license, we would lose our livelihood and everything we've worked for for 65 years. Twenty-five people would lose their jobs. We would have nothing of value to sell when we retire.

It is horrifying to think that this is even a consideration. Please have some humanity and vote no on this proposed regulation.

Thank you sincerely,

Christy

Christy Tengs Fowler
Pioneer Bar & Bamboo Room Restaurant
PO Box 190
Haines, AK 99827
907 314 0444

From: Dick Ellsworth
To: [CED AMCO REGS \(CED sponsored\)](#)
Cc: joniellsworth@gmail.com
Subject: New regulations to dispose of liquor licenses if application is incomplete 4/12/18
Date: Wednesday, April 11, 2018 6:44:35 PM

Dear esteemed AMOC Board,

The proposed regulation to terminate liquor licenses after 90 days because of incomplete applications or failing to fill out at all is way to harsh!

Often the liquor license may be the most valuable thing the business or person, couple, or family own.

The state gets valuable revenue from the liquor industry. I would think with your position you would want to work with them/us!

Do you really want to ruin lives because someone did not fill in the proper blank properly?

Strength Through Unity,

Dick and Joni and Ellsworth

Ivory Jack's Restaurant

Ivory Jack Discount Liquors

Fairbanks, Alaska

Cc D & J

From: STEVEN KANTOR
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: Potential AMCO regulations
Date: Wednesday, April 11, 2018 4:11:27 PM

April 10, 2018

Comments from Ketchikan CHARR members regarding proposed regulation changes on license renewal deadlines

This proposal is a non-starter for the industry. It is essentially a “death penalty” for license holders who neglect to file their renewal application for 3 months. The Board currently has flexibility to look at each late renewal application and make a determination. This provision would tie the Board’s hands and take away their discretion.

Who benefits from tying the Board’s hands and eliminating its discretion? Certainly not the licensees, who sometimes face difficult circumstances and sometimes make mistakes. In our view, this discretion is the reason that the ABC Board exists.

Why would we want a licensee to lose their business and their livelihood, and all their employees lose their jobs because of late filings?

If all licenses allowed to expire were permanently revoked this year, it would have been 82 licensees that received the “death penalty” for late filings, or incomplete filings, or because they hadn’t updated their address with the AMCO staff. None of these infractions merit permanent revocation. Frankly, the concept is outrageous.

Ketchikan CHARR members number over 40 members. Our membership asks the ABC Board to reject this proposed regulation in the strongest terms possible.

on behalf of the following members; Thank you for your consideration.

Airport Lounge P. O. Box 8256 Ketchikan, AK 99901
Alaska ATM Service James Dainis P O Box 190438 Anchorage, AK 99519-0438
Alaska Indoor Sports Distributing 116A Eichner Avenue Ketchikan, AK 99901
Alaska Liquor Store P. O. Box 23363 Ketchikan, AK 99901
Alaska Marine Lines 3295 Tongass Ave Ketchikan, AK 99901
Allen Marine Tours INC. Amanda Painter 5 Salmon Landing Suite 215 Ketchikan, AK. 99901
American Legion Post No. 3 P. O. Box 5121 Ketchikan, AK 99901
Annabelle's 326 Front Street Ketchikan, AK 99901
Arctic Bar 509 Water Street Ketchikan, AK 99901
Bar Harbor Restaurant 2813 Tongass Ave Ketchikan, AK 99901
Cape Fox Lodge 800 Venetia Way Ketchikan, AK 99901
CREEK STREET CABARET PO BOX 5081 KETCHIKAN, AK. 99901
Eagles Fraternal Order No. 162 P. O. Box 8162 Ketchikan, AK 99901
First City Saloon 830 Water Street Ketchikan, AK 99901
Forty-Niner Bar & Liquor Store 1010 Water Street Ketchikan, AK 99901
G. Games P. O. Box 7642 Ketchikan, AK 99901
George Inlet Lodge Patricia Shaughnessy 11728 S. Tongass Hwy. Ketchikan, AK 99901
K&L Distributors Attn Eric Brooks 1395 Woodside Drive Ketchikan, AK 99901

Ketchikan Elks Lodge #1429 P. O. Box 5177 Ketchikan, AK 99901
Ketchikan Moose Lodge #224 P. O. Box 5224 Ketchikan, AK 99901
Ketchikan Soda Works P. O. Box 7600 Ketchikan, AK 99901
KLAWOOCK LIQ. STORE PO BOX 469 KLAWOOCK, AK. 99925
Mike Troina Knudson Cove Marina 407 Knudson Cove Rd North Ketchikan, AK 99901
Mike's Elbow Room P. O. Box 8535 Ketchikan, AK 99901
My Office GEORGE TIPTON 2050 SEA LEVEL DR STE. 103, AK 99901
New York Hotel & Cafe P. O. Box 23154 Ketchikan, AK 99901
Newtown Liquor 2417 Tongass Ave #101 Ketchikan, AK 99901
Northern Sales Company, Inc. P. O. Box 8112 Ketchikan, AK 99901
Oceanview Restaurant Luis Orta 1831 Tongass Avenue Ketchikan, AK 99901
Odom Corporation 3295 Tongass AVE Ketchikan, AK 99901
Pioneer Entertainment 300 Mill Street Suite 28 Ketchikan, AK 99901-6575
Potlatch Bar P. O. Box 6615 Ketchikan, AK 99901
Salmon Falls Resort 16707 NO TONGASS Ketchikan, AK 99901
Sealaska Inn P. O. Box 33 Hyder, AK 99923
SHOGUN Restaurant Hye Chung 1287 Tongass Ave Ketchikan, AK 99901
Sourdough Bar 301 Front Street Ketchikan, AK 99901
Sourdough Liquor Store 301 Front Street Ketchikan, AK 99901
Specialty Imports 3195 Pioneer Avenue Juneau, AK 99801
Asylum 522 Water Street Ketchikan, AK 99901
The Landing Hotel & Jeremiah's P. O. Box 6814 Ketchikan, AK 99901
Edgewater Inn 4871 No Tongass KTN, AK. 99901
Totem Bar & Liquor Store 314 front st Ketchikan, AK 99901
V.F.W. Post 4352 P. O. Box 8275 Ketchikan, AK 99901
Ward Cove Deli & Liquor P. O. Box 559 Ward Cove, AK 99928
Waterfall Resort P. O. Box 6440 Ketchikan, AK 99901
WILLIAMS INC, P. O. Box 9235 Ketchikan, AK 99901
Wines International Ltd. No. 5 Salmon Landing, Ste. 108 Ketchikan, AK 99901

Steven Kantor
U.S. Spirits Inc.,
K&T Investments LLC
Ketchikan CHARR Inc

From: Dorothy Cunningham
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: RE: Expired and late filed licenses
Date: Wednesday, April 11, 2018 3:23:30 PM
Importance: High

To Whom it may Concern:

I find it hard to believe that someone that has a BDL that is about to expire is not given more time to reinstate that license should they be able to show that there were circumstances beyond their control to get this done in a timely manner. No one should lose their business nor their livelihood, nor should their employees suffer from loss of employment because the employer forgot or didn't fill the paperwork out correctly. I would think that the AMCO or ABC Board should be able to take a few minutes and call, email or even snail mail the licensee to notify them that they have so many days to get this taken care of or there will be a process that will then expire the license. I don't think that it is fair to just expire the license without all avenues of notifying the licensee having been done. If after having notified them and still no answer then I would be okay with the expiration of that license.

Hopefully this will be taken into consideration.

Dorothy Cunningham
Vagabond Inn Inc.
38515 K-Beach Rd.
P.O. Box 1662
Kenai, Ak. 99611
Cell: (907) 398-0471
Msg: (907) 283-9211

*Alaska Cabaret, Hotel,
Restaurant and Retailer's Association*



*1503 W. 31st Avenue, Suite 202
Anchorage, AK 99503
(907) 274-8133 • Fax (907) 274-8640
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April 12, 2018

Comments from Alaska CHARR regarding proposed regulation changes on license renewal deadlines

This proposal is a non-starter for the industry. It is essentially a “death penalty” for license holders who neglect to file their renewal application for 3 months. The Board currently has flexibility to look at each late renewal application and make a determination. This provision would tie the Board’s hands and take away their discretion.

Who benefits from tying the Board’s hands and eliminating its discretion? Certainly not the licensees, who sometimes face difficult circumstances and sometimes make mistakes. In our view, this discretion is the reason that the ABC Board exists.

Why would we want a licensee to lose their business and their livelihood, and all their employees lose their jobs because of late filings?

If all licenses allowed to expire were permanently revoked this year, it would have been 82 licensees that received the “death penalty” for late filings, or incomplete filings, or because they hadn’t updated their address with the AMCO staff. None of these infractions merit permanent revocation. Frankly, the concept is outrageous.

Alaska CHARR asks the ABC Board to reject this proposed regulation in the strongest terms possible. Thank you for your consideration.

From: Les Dennis
To: [CED AMCO REGS \(CED sponsored\); phanson@alaskacharr.com](mailto:phanson@alaskacharr.com)
Subject: AMCO 90-day death penalty rule
Date: Thursday, April 12, 2018 10:36:58 AM

This proposal is a non-starter for the industry. It is essentially a “death penalty” for license holders who neglect to file their renewal application for 3 months. The Board currently has flexibility to look at each late renewal application and make a determination. This provision would tie the Board’s hands and take away their discretion.

We do not benefit from tying the Board’s hands and eliminating its discretion. We sometimes face difficult circumstances and sometimes make mistakes. This discretion is the reason that the ABC Board exists. I wouldn’t want to lose my business and livelihood, and all my employees lose their jobs because of late filings, or incomplete filings, or because we didn’t update our address with the AMCO staff. None of these infractions merit permanent revocation.

AmVets Post 2 asks the ABC Board to reject this proposed regulation in the strongest terms possible. Thank you for your consideration.

Les Dennis
AmVets Post 2



Virus-free. www.avast.com

From: Arden Rankins
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: Re: Liquor Licenses
Date: Sunday, April 15, 2018 3:02:52 PM

Dear ABC Board,

My name is Arden Rankins and I own the Sunrise Inn in Cooper Landing. Along with this ownership I own a Tourism License and a Package Store License. I am writing to voice my deep concern relating to a proposed change that would permanently expire all alcohol licenses that were not renewed by March 30th of each year.

I have only owned the Sunrise Inn since November of 2015 so I am relatively new to the industry. I have already had to deal with the issue of the Tourism License which was expensive to deal with through absolutely no fault of my own and before this issue is solved there is another one on the table.

It is my understanding that AMCO falls under the heading of State Economic Development. If my understanding is correct then it should be true that AMCO should be here to support people in the industry. So far my experience is that it is the opposite. It seems like it's AMCO against business owners. This to me is a very sad state of affairs.

I am voicing my opinion to state how completely unfair it would be to strip hard working people of their liquor license(s) over a paper work problem. I have a very current personal matter that I would like you to consider. On April 6th while loading groceries at Costco I slipped and fell backwards over a box that had been set aside. My head smashed against the bumper of the car next to mine. I lost consciousness for a few minutes. Since then I have been dealing with the strong and bad side effects of a serious concussion. I've had to see a doctor 4 times since. I had to have a brain scan. The good news is that my brain is not bleeding but the bad news is that I could be dealing with all of my issues for up to 6 months. I have trouble concentrating. I'm nauseous all the time. I'm not going into the rest of the details. My point being is that if my license was up for renewal and I didn't have my wits about me as well as a great staff I could be in serious trouble.

The costs involved for me would be astronomical. I paid \$1,000,000. for the Sunrise Inn. It was in serious disrepair as lots of 1950's road houses are. I put an additional \$200,000. into repairs and upgrades into the place before I opened. I did things like have the Kenai River painted on the floor complete with sockeyes, rainbows and dollys in the river to enhance the place. I have worked continually since the doors opened on February 14th, 2016 to make the place a success. Days off are a treat! I take a very minimal wage and live off of rentals I have. I have put the money made back into the business. I'm hoping this summer will be very successful and money will start coming my way. I am telling you this private information to show you the realities of what your decision could do to me.

I have had no infractions on my record with AMCO or the DEC health inspectors and it is my intention to never have any. So with a clean record and then a smashed head if I fell behind on paperwork and lost my licenses my fine in effect would be the entire loss of the Sunrise Inn as it has no resale value without the liquor licenses. Cost of this loss would be about \$1,500,000. Doesn't that sound extremely outrageous! A paperwork fine of \$1,500,000. So much for the \$500. late penalty. If this action proceeds forward then it seems to me that the

state should also be able to go after the pensions of state employees if they don't have every part of their job done perfectly and in the time frame that the state deems correct. That could possibly save the state millions as well. I know this sounds ridiculous. That is my point!

I also understand that there are probably liquor license owners that are continually a nuisance for the board to deal with. My request is that you deal with these violators on a one to one basis rather than making a blanket law that has no consideration that people aren't perfect and that issues do come up in people's lives.

I would really appreciate having a board that works for the people instead of against them as it currently feels to me. We are hard working people who pay the state a lot of money now and all we want to do is to continue to be hard working people.

Thank you for your time reading and considering this. It has taken me ages to write it as my concussion makes it very hard to focus. However I believe it to be very important and potentially my livelihood had I hit my head harder and this proposed change was law.

Arden Rankins

From: cmarket@gci.net
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: PROPOSED CHANGES ON TRANSFERS, REINSTATEMENT AND RENEWALS OF LICENSES IN THE REGULATIONS OF THE ALCOHOLIC BEVERAGE CONTROL BOARD
Date: Friday, April 13, 2018 4:48:05 PM

From: Jay Hepner, General Manager
City Market Wrangell, Alaska

Subject: PROPOSED CHANGES ON TRANSFERS, REINSTATEMENT AND RENEWALS OF LICENSES IN THE REGULATIONS OF THE ALCOHOLIC BEVERAGE CONTROL BOARD

I agree this is a "Death Penalty" for license holders who do not file their application on time or have an "incomplete application" will lose their current license. There are always exceptions to the rule like personal issues such as personal/family medical problems; being out of town/state due to personal or business reasons on vacation or whatever. For these matters I feel licensees should have the opportunity to go before the ABC Board and ask to be reinstated as under the current regulations. If the AMCO Staff gets this regulation through licenses that expire could not be reinstated. This will be a "Death Penalty" and take away the rights of all that are not making the deadline.

From: Shelly L. Shank
To: [CED AMCO REGS \(CED sponsored\)](#)
Cc: phanson@alaskacharr.com
Subject: Liquor license renewal changes
Date: Tuesday, April 17, 2018 8:07:28 AM

ABC Board Members,

I would like to put in my two cents on the proposed changes to the liquor license renewal process. I do agree that there are circumstances that arise and for every late renewal, the board should be able to address them individually. The owner of the Breeze Inn, in Seward Alaska, lives out of state. Sometimes mail has been sent to his other business instead of the actual place of doing business. There have been times that this has happened with time sensitive paperwork and we were fortunate that things could be worked out. I believe business owners intend do everything in a timely fashion and sometimes unforeseen obstacles get in the way.

I agree that making these changes would adversely affect business owners livelihood, in the event of such obstacles. Please oppose the new regulations that would prevent reinstatement after March 30.

Best Regards,

Shelly L. Shank
Assistant GM
Breeze Inn Motel
303 North Harbor Street
Seward, Alaska 99664

From: Leeann Thomas
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: public comment on regulation change of license renewal
Date: Friday, April 20, 2018 8:44:58 AM

Dear ABC Board,

I strongly oppose the proposal to change the alcohol license renewal deadline. Having a March 30th date as a drop-dead date for a license is unacceptable. The board should keep the law flexible so each late renewal could be reviewed if there was a circumstance to warrant a review. The AMCO staff and business owners both make mistakes. License renewals have been sent to the wrong location (physical not mailing address), notices and communication via email has ended up in junk mail, and if the applications have not been filled out to the standard of a staff member at AMCO, there is not a system to insure this is communicated to the correct person in charge of the license application. All of these examples have happened to owners who were trying to renew their license in a timely manner. There should not be a date the license is lost without a review. The ABC board/AMCO should be supporting businesses not trying to take away license by a deadline.

Every year the license application changes. Even with 20 years of experience, I'm always comparing my old license renewals with current applications to make sure I fill them out correctly. It's not as easy as a person would think. If you have a question the AMCO staff has a response time of 7 to 10 days for questions left by voice mail or email. A lot of things happen in 7 to 10 days! What if the staff does not answer your question or you miss something on the form?

I also find it interesting the AMCO wants to add a drop-dead date to lose a license (without a review) when currently most liquor licenses in Juneau still have temporary licenses on their walls. I mailed my renewal on November 13, 2017 and the Juneau Assembly did not protest my license in December at the regularly scheduled meeting. However, I still have a temporary license on my wall 5 months later. Why? I think I did everything right and timely to get my renewal on my wall. The ABC has not informed me anything was wrong with my renewal, I have no violations with ABC or the City, so why do I still not have my 2018 license? I feel the ABC has not been responding in a quick timely manner, so this is not the time to add a strong deadline for licenses without a chance for review.

Once again, I do not think the proposed change for license renewal is a good idea. Please do not place a March 30th deadline on renewals. People's business, livelihood, retirement, and employees jobs are a stake. I'm not sure the point of this change. The magnitude of the penalty for what could be a simple clerical mistake seems over the top.

Thank you,

Leeann Thomas
Triangle Club
Juneau, AK

From: Paul Thomas
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: Public Comment REG 3 AAC 304
Date: Friday, April 27, 2018 4:10:20 PM

Public Comment for: regulation changes in 3AAC 304 of the Alaska Administrative Code, dealing with deadlines for transfers, reinstatement and renewals of alcohol licenses.

I am not in favor of this regulation project and do not support it going forward.

The language addition in section in 3AAC 304.160(e) "**submitted by March 30 and**" is particularly troubling.

This trend of trying to take power of discretion away from the actual board is contrary to the whole reason for there being a board.

Title 04 says that the director shall take actions similar to this only at the direction of the board.

Sec. 04.06.080. Delegation of authority.

The director shall issue, renew, transfer, suspend, or revoke all licenses and permits at the direction of the board.

For the director and staff to purpose a regulation change to take power away for the board in an effort to kill licensees regardless of the licensee's circumstances is ridiculous.

Given the fact that so many license applications are being turned back by staff recently as incomplete applications. For, in many cases, very small administrative issues. Add the aggravation of a practically unreachable AMCO office that has even stated it will take 7 to 10 days to respond to attempts to contact staff. This is completely unacceptable regulation change.

To think that a person should lose their license, Business, Livelihood as well as all the people they employ livelihoods with no chance of being heard is ridiculous. A fault in administrative paperwork should never be considered a valid reason to destroy people's lives without even listening to the potential good cause for such a mistake. Many of these licenses if revoked would never be available again due to grandfathering, population changes, ect.

Please do not allow such grievous actions to be taken without consideration from the board as was always intended under title 04.

Thank you
Paul Thomas

Paul J. Thomas
Alaska Cache Liquor Inc.
P.O. Box 20977
Juneau, Alaska 99801
Ph 907-586-2232
Fax 888-517-5531

TO: ABC Board

DATE: April 26, 2018

FROM: Darwin A. Biwer, Jr.

SUBJECT: March 30th Deadline

I have been a Beverage Dispensary licensee for 36 years (since 1981). My very successful business is my sole source of income. To think that I could loose it because of a clerical error, either on my part or the ABC Board staff is unthinkable. No judge would ever uphold such an action.

Once an application is received in the ABC Board office, it is officially received, complete or not. The subsequent review and completion of that application is within the acceptable confines of the laws and regulations of Title IV.

The reason the legislature moved the ABC Board from Public Safety to Commerce and Economic Development isn't to destroy Alaska's economy, but to enhance it. This proposal is contrary to the Legislature's intent.

As the Chairman of Alaska CHARR's Board of Directors I officially object to this Proposal.

Respectfully submitted! Thank You!

Submitted By	Comment
<p>4/18/2018 3:59:44 PM Sahuarita, AZ, US Anonymous User</p>	<p>Why is there a need for such a severe punishment to include loss of livelihood, business, employees, community social wellbeing and economic benefits? License holders are already significantly fined for late filings which may be beyond lic.. holders control. These already costly renewals are sometimes difficult during slow times but we manage to pay small guy, big guy. Please reconsider your proposal. Thank you.</p>
<p>4/12/2018 10:26:35 AM Larine Dunham thetrees@ak.net Petersburg, AK, US Anonymous User</p>	<p>Please vote against the change in deadlines for renewing a liquor license. The administrative paperwork that small businesses deal with seems to be growing every year. It could be very easy to overlook the upcoming date for an expiring liquor license, especially as it's not something you do every year, but once every two years. Thank you</p>

From: George Tipton
To: [CED AMCO REGS \(CED sponsored\)](#); [Pete Hanson](#); [Michael Cervantes](#); [Dale Fox](#)
Subject: proposed new regulation
Date: Friday, April 13, 2018 8:19:46 AM

I am stringently opposed to a new proposed regulation that would permanently expire all alcohol licenses that were not renewed by March 30th.

Many things can occur that cause a delay in the renewal process but to take something this far is absurd. There are plenty of available statues for the Board and the office to utilize when renewing and/or denying a license without adding to the bureaucracy. We already have a huge inherent risk with the business, responsibilities, paperwork, etc. Just because someone fills out paperwork wrong and already pays a \$500 penalty, does not understand what it is that the department really wants, in other words “missed paperwork”, you wish to take away their license that can be their whole life savings! That is absurd.

I must ask why the department has not looked into a suggestion I first made over 10 years ago and again 6 years ago about following DMV’s format. X number of Licensees renew each month throughout the year over the 2 year format, thus the renewals are spread evenly throughout the year for the staff as well as for the 5 meetings for the Board so they do not get hit with 850 – 900 renewals at the 1st meeting of the year. Staff can then be more timely with their process requirements for the Licensee holder and everybody is mutually satisfied. This would be an easy change to make for all. This also helps to potentially solve the proposed need to terminate a license if not renewed within 90 days.

There are many different options available but to add a new regulation as proposed is not one of them.

Thank you for time.

Respectfully,

George H. Tipton
Multiple License Owner
ghtiption@kpunet.net
907 617 3372