

January 8, 2026

**VIA EMAIL**

Alcohol and Marijuana Control Office  
Alcohol Licensing  
550 W 7th Avenue, Suite 1600  
Anchorage, AK 99501  
[alcohol.licensing@alaska.gov](mailto:alcohol.licensing@alaska.gov)

Re: **Request for Confirmation No Alaska Liquor License Required (*The World* Private Yacht AS 04.11.010)**

Dear Alcohol and Marijuana Control Office:

ROW Management Ltd. ("ROW") manages and operates *The World*, a privately owned vessel. ROW submits this letter to confirm that *The World's* operations do not require an Alaska alcoholic beverage license or permit while the vessel is present in Alaska waters. *The World* is scheduled to be in Alaska from **August 5, 2026 through August 10, 2026, including docking in Anchorage from August 5, 2026 through August 7, 2026, and docking in Homer from August 8, 2026 through August 10, 2026.** This conclusion is based on Alaska Statutes Title 04 and implementing regulations in 3 AAC 305, which regulate commercial manufacture, sale, barter, and trafficking in alcoholic beverages.

ROW provides the information below to demonstrate that no licensable activity occurs aboard *The World* and respectfully requests AMCO confirmation that no Alaska alcoholic beverage license or permit is required during the vessel's presence in Alaska.

ROW understands that any response would be informal and non-binding but would greatly appreciate AMCO guidance.

### **Overview of *The World's* Operations**

*The World* is a privately owned yacht whose owners are individuals referred to as Residents. Only Residents and their personally invited guests are permitted aboard the vessel. The vessel is owned by a legal entity that is owned by the Residents. In substance and operation, *The World* functions as a floating residential community, not as a commercial hospitality enterprise.

Although it may look like one from the outside, the vessel is not a cruise ship, passenger vessel, or public accommodation. It does not carry passengers for hire, does not sell tickets, and does not admit members of the public. *The World* is the Residents' home and is not a vacation destination. The only difference between *The World* and any other private yacht is simply the size of the vessel.

The vessel cannot be accessed by purchasing a ticket, making a reservation, or through any public invitation or commercial arrangement.

### **Alcohol Service Aboard *The World***

The vessel includes dining venues and bar facilities that are exclusively for the use of Residents and their invited guests. These facilities do not operate as commercial restaurants or bars and are not open to the public.

Residents collectively share the costs of operating the vessel, including Food and Beverage operations

("F&B"), without profit, markup, surcharge, or premium. ROW does not derive revenue from the provision of alcoholic beverages.

The costs of F & B are shared by dividing the anticipated cost of the operation on an annual basis among the Residents. Residents pay the fixed costs of operations in advance, and the costs of the F & B served in the restaurants and bars are paid for directly by the Residents through quarterly payments. The cost of the F & B operation is estimated at the beginning of each year. An account is kept of the F & B each Resident and his or her guests consume to accurately measure whether a Resident consumes more than his or her allocable share of the total estimated cost. If a Resident and his or her guests consume more than the Resident's pro rata share of the total, then the Resident may be required to make an extra payment. There are no per drink charges, point of sale transactions, tabs, or retail pricing for alcoholic beverages aboard the vessel.

Alcoholic beverages served aboard *The World* are owned by the Residents, not by ROW or the vessel. Alcohol is purchased outside the State of Alaska by crew members acting solely as agents for the Residents. Title to all alcoholic beverages remains with the Residents at all times. No alcoholic beverages are purchased, sourced, or supplied from Alaska licensees.

No alcohol is or will be purchased in Alaska, either prior to the vessel's arrival or during the time the vessel is present in Alaska waters. All alcohol will have been previously purchased prior to coming into port and, therefore, there will be no need to purchase any alcohol for service aboard the vessel while in Alaska.

While the vessel is present in Alaska waters, the only alcohol related activity is the private service of alcoholic beverages already owned by the Residents, in a non-commercial and residential context.

Any alcohol served on *The World* has been previously purchased from a licensed source on behalf of the Residents and is owned by the Residents; the costs of alcohol and related F & B operations are allocated among Residents through the shared operating cost and accounting structure described above, without profit, markup, premium, or other commercial margin.

As such, the crew members on the ship are not selling alcoholic beverages to the Residents or their guests; rather, they are simply providing personal chef services and pouring the beverages already owned by the Residents as part of the restaurant and bar services provided by *The World*.

### **No Alaska Alcoholic Beverage License Is Required Under AS 04 and 3 AAC 305**

Alaska regulates alcoholic beverages through Alaska Statutes Title 04 and implementing regulations in 3 AAC 305, administered by the Alcoholic Beverage Control Board and the Alcohol and Marijuana Control Office.

AS 04.11.010 provides that, except as provided in AS 04.11.020, a person may not knowingly possess for barter, traffic in, or barter an alcoholic beverage unless under a license or permit issued under Title 04, and may not manufacture an alcoholic beverage, sell an alcoholic beverage, or offer an alcoholic beverage for sale unless under a license or permit issued under Title 04.

*The World* does not manufacture alcoholic beverages. *The World* does not sell or offer alcoholic beverages for sale. *The World* does not barter alcoholic beverages. *The World* does not traffic in alcoholic beverages.

No valuable consideration is exchanged for alcoholic beverages served aboard *The World*. Residents do not purchase alcoholic beverages from ROW or from the vessel. The shared cost allocation structure among Residents is a private allocation of operating expenses without profit, markup, surcharge, or premium and does not constitute a commercial sale, barter, or trafficking activity. Crew members merely pour or serve alcoholic beverages already owned by the Residents, in the same manner as

service provided within a private residence.

Accordingly, based on these facts, ROW respectfully submits that *The World* is not engaging in any conduct requiring licensure under AS 04.11.010 and 3 AAC 305 because there is no manufacture, sale, offer for sale, barter, or traffic in alcoholic beverages while the vessel is in Alaska waters.

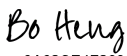
### **Conclusion**

For the reasons described above, ROW respectfully submits that *The World's* operations do not require an Alaska alcoholic beverage license or permit during periods when the vessel is present in Alaska waters.

ROW appreciates AMCO's consideration of this request and would welcome the opportunity to provide additional information or clarification that may be helpful.

If this request should be directed to a specific licensing examiner, unit, or staff member, please advise and ROW will promptly resend the request accordingly.

Sincerely,

Signed by:  08-Jan-26 | 13:13 EST  
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Bo Heng  
Director of Risk Management and Contracts  
ROW Management Ltd.