From: John Church
To: CED AMCO REGS (CED sponsored)
Subject: Exterior Window Pickup Reg Comments
Date: Saturday, December 10, 2022 10:37:43 AM

You don't often get email from j_church@live.com. Learn why this is important

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi All,
My name is Johnathan Church and I used to be a licensing examiner for AMCO, as well as a former legislative aide in Juneau. As someone who has had to deal with unclear regulations in the past, I want to offer some comment on this proposal and pose some questions I would have if I were still processing applications:

1. 3 AAC 306.380(e) requires that all individuals in a vehicle must be 21 year of age or older unless they are the children, grandchild, or ward. How does the board expect this to be carried out? Will all ID's need to be checked in the car? If the customer's child is under the age of 16 and doesn't have an ID, how will a sale be completed? Will licensees be required to have customers sign affidavits so that if it turns out someone was lying they will be covered?
    a. This seems to be creating an undue burden on the licensees, as well as AMCO Enforcement, in an attempt to create the illusion that it will increase public safety. If you are going to go forward with this regulation this requirement should be removed. It is realistically unenforceable.

2. Additionally, "ward" is not defined in regulations so what does that entail?

3. The new regulations include that all sales of marijuana and marijuana products via walk-up or drive-through exterior window are subject to requirements and restrictions imposed by relevant local governments. Will the local government have the opportunity to review all potential drive-thru windows prior to the activity being approved by AMCO? Will it be an endorsement for a retail license similar to On-Site Consumption?

To me there is a lot of room for abuse in this type of regulation. There is a reason that drive-thru liquor stores are not a thing in Alaska, as they would have many of the same issues. If you want to buy alcohol or marijuana, it's not that hard to go into a store and pick-up product. The licensees are better protected and enforcement is not given another unenforceable regulation.

If you have any questions let me know.

Best,
John