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To:	CED AMCO REGS (CED sponsored)
Cc:	Christian Hood; Trevor Haynes; Greg Allison
Subject:	Public comment on Exterior Window Pickup
Date:	Monday, December 12, 2022 10:56:42 AM

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Dear Members of the Board,

I appreciate AMCO staff taking the time to put together a draft regulation concerning exterior window pick-up.

I am in support of exterior window pickup in general. My primary reason is that children are not allowed to be in a marijuana establishment. If children were allowed on premise, I would not have as much desire to see this regulation change move forward. Parents don't always have the luxury to have someone look after their child while shopping and running errands. This allows a way for parents to do the shopping they want, without having to leave their children in the vehicle.

Of this draft, the main issue I see is in section 3AAC 306.310(e). Identifying individuals under the age of 21 in the car is not feasible. Eight-year-olds do not generally have government issued identification. Furthermore, how is a budtender to know if the children are the ward, child or grandchild of the adult?

I believe that this section should be omitted. Current regulations allow children to be in the vehicle when a customer goes to by marijuana, and the children are allowed to be there when the person returns to the car with the marijuana. I do not see a reason to identify the ages of the individuals in the vehicle unless they are attempting to make a purchase.

The other section I believe could use additional work is 3AAC 306.380 (c). It states the area immediately outside a walk-up or drive through exterior window must be under the licensee's sole possession. The phrase "sole possession" seems a bit ambiguous unless further defined. Certainly, it is up to the board to interpret what would be considered sole possession, but for the sake of public comment it is difficult to take a stance on a term that has yet to be defined. The term sole possession could potentially be used so that no leased properties could apply for this option as that may be considered exclusive possession, but not sole possession due to another party maintaining ownership. I would be against an interpretation that disallowed businesses to operate with an exterior pick-up window based solely on whether they were an owner of the property or a leasee. Perhaps the term "sole possession" is not an issue, but I would look to the lawyers in the room for that advice. I wanted to bring it up as a source of confusion regarding the intent of the regulation.

I look forward to hearing the discussion and thank you for your consideration in this potential regulation change.

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