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**Sent:** Thursday, March 17, 2022 9:52 AM  
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**Subject:** RE: Regulation Workshop for LCB File No. R068-21 - Liquor Delivery and Periodic Auditing

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Hi Sarah –

As a follow up to the below, we have received additional simple comments from our third-party alcohol delivery clients related to these regulations that we wanted to share ahead of the Workshop.

- (1) Curbside: The regulations only contemplate delivery to another premises (e.g., Section 3 restricting delivery “only to a person at the address specified.”) It would be helpful if the regulations could clearly indicate that curbside delivery is also allowed pursuant to the same or similar regulations; i.e., a licensed retailer or their delivery support service can deliver and online order of alcoholic beverages to a person of legal drinking age who requests delivery both to a location off the licensed premises as well as a designated area (e.g., the parking lot or curbside) near or adjacent to the licensed retailer.
- (2) Delivery Records: As currently drafted, Section 6 requires certain delivery records kept by a licensed retailer to be produced “on demand.” While we have no issues with requiring these records to be maintained or presented to the Department, we request that they rather be required to be provided “upon reasonable notice” to provide the business with a reasonable amount of time to gather and provide the requested records.
- (3) Training: Some alcohol delivery businesses have internal comprehensive alcohol awareness training programs that are specific to the issues related to *delivery* of alcoholic beverages. In that regard, we request that the requirement is Section 3 requiring alcohol awareness training cards for certain personnel making a delivery be broadened to instead require that such personnel first receive adequate training meeting the same minimum requirements.

Thank you,

**Ryan Saxe**  
Shareholder

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