



December 21, 2017

Bob Klein, Chair
Alcohol Beverage Control Board
550 W 7th Ave, Suite 1600
Anchorage, AK 99501

[via email AMCO.Reggs@alaska.gov](mailto:AMCO.Reggs@alaska.gov)

Dear Mr. Klein and the Alcohol Beverage Control Board,

The Fairbanks Chamber supports a legislative statutory review and revision process of statutes that govern distilleries, to include:

- ✓ **Public engagement** – to give community and business ample opportunity to provide comment on how enforcement can and should protect the public from harm;
- ✓ **Initial intent** - to research the legislation and ensure that regulation, policy and procedure align with original statutory intent;
- ✓ **Consideration for conflicts of interest** – to ensure the outcome of statute review and interpretation is determined by individuals who hold no personal benefit from further limiting distilleries.

Interpretation of regulation should be guided by the Alcohol and Marijuana Control Office (AMCO) mission statement to: *enforce... and provide clear, consistent standards for licensure to protect the public from harm.* Distilleries have been safely operating for years, yet recent changes in regulation interpretation demonstrate misalignment to AMCO's core mission. The Director's recent memo to the Board illustrates an imbalance between stricter interpretation of regulation and the call to protect the public from harm. The memo specifically calls out unwarranted concerns with distilleries hosting paint parties, yoga classes, yodeling competitions and poetry readings, which are examples that appear to be in conflict with the mission statement.

We understand that the Director seeks the Alcohol Beverage Control Board input to interpret "distillery's product" and how product can be served on a licensed premises, and there is a perceived effort to unfairly limit distilleries through more stringent interpretation. The public will not be further protected from harm by limiting the ways in which a distillery product can be served, including prohibition of ice cubes, lime slices, and non-alcoholic mixers at distilleries, which are accompaniments that would otherwise complement a sample of a distillery product, considering the normal consumption of these types of spirits is rarely "straight up". There is obvious and implied overreach in such an action to eliminate these common items from being served.

Businesses expect that regulations and interpretations will be consistent, reliable, and safeguard the public. Alaskans make investment decisions in business, and in turn, when there is a shift in interpretation of regulations that affect the way these businesses can operate, livelihoods and local economies are adversely impacted.

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The Greater Fairbanks Chamber of Commerce represents over 700 businesses in the Greater Fairbanks area and across the State. We advocate on behalf of our members for a healthy economic environment and we build partnerships that promote the greater Fairbanks area as an attractive place for business and community. We work to create a pro-business environment that encourages private sector investment and job creation by working with local, state and federal government officials.

Respectfully,



Marisa Sharrah
President & CEO
Greater Fairbanks Chamber of Commerce



Garry Hutchison
Board Chair
Greater Fairbanks Chamber of Commerce

Cc: Interior Delegation
Governor Bill Walker