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SUBS, INC t/a Stone Grille & Taphouse 204 ST. CHARLES WAY #G YORK, PA. 17402 717-741-0883

RECEIVED IRRC

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Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

Re: IRRC # 3093

To Whom It May Concern,

I am writing this letter in regards to the RAMP Program. I am currently a co-owner of a full service restaurant/tavern in York, Pa. I have been in the business for over 30 years. Around 1990, I became a T.I.P.S. Trainer because of the amount of staff we employed, turnover and the fact that we wanted to operate a responsible bar. It was more cost effective for me to become a trainer than to pay to send my staff regularly to a training session. After a few years of only training my staff, the local Anheuser-Busch Distributor asked me to become the York County trainer and hold training classes regularly for York County Licensees.

As a T.I.P.S. Certified Trainer and a Licensee, one of the key elements missing from the T.I.P.S. program was material that was specific to the State of Pa. As a licensee, I was very familiar with the items that were missing from the curriculum. The T.I.P.S. Program was a National Program and it had to be generic so that the same curriculum could be used by trainers in every state. As part of my class, I added in the state specific items. As a result of my "hands on" knowledge, my training classes became very popular for both owners & their staff.

In 2006, the Pa. Tavern Association developed their own server/seller program called TAPS. which was approved by the Pa. Liquor Control Board. I was on the Board for the Association and was very involved in developing the course with the Executive Director. I was also asked to become a trainer for them. Initially, I was certified to train T.I.P.S. and TAPS.; however, most of my classes I used the TAPS curriculum because it was geared towards PA laws. When my T.I.P.S. certification expired, I did not re-certify because the curriculum was not as extensive as the TAPS. program. I would not train my employees using the T.I.P.S. curriculum, why would I train any other individual using it?

Later, in 2010, the Pa. Liquor Control Board created their own RAMP a specific curriculum that is PA state specific. I felt that the decision that the Pa. Liquor Control made to have an approved curriculum to be used for PA licensees made so much sense for our state and licensed businesses. I was still on the Board of our statewide association and we made the decision to become an approved third-party trainer for the universal curriculum in the best interest of licensees.

By allowing a program into the RAMP Program that is not state specific, most licensees do not realize this. In turn, they are spending money training their staff; however, the staff is not learning the specific things that they need to do their job in PA.

Sincerely, Danette E. Small-Shultz, V.P.