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OFFICE OF CHIEF COUNSEL

May 6, 2015

Rodrigo Diaz, Esquire
Executive Deputy Chief Counsel
Pennsylvania Liquor Control Board
401 Northwest Office Building
Harrisburg, Pennsylvania 17124-0001

RE: Pennsylvania Liquor Control Board Proposed Regulation #54-79:
Responsible Alcohol Management Program

Dear Mr. Rodriguez:

On behalf of individual Training for Intervention Procedure's (TIPS) trainers across the Commonwealth of Pennsylvania, we write you to offer public comments on the Pennsylvania Liquor Control Board's (PLCB) proposed regulation #54-79, which addresses changes to the Responsible Alcohol Management Program (RAMP).

We thank you and the PLCB board members and staff for your hard work over the past year on these proposed regulatory changes to RAMP. These modifications are meaningful and impactful for trainers and students alike. We are proud small business owners in the state and as such, we continuously strive to improve our business model to better serve our students in an effort to make Pennsylvania a safer place. The PLCB regulations will provide additional and further enhanced training options for the alcohol service industry under RAMP.

As trainers for those who serve alcohol, we choose to teach TIPS because of the fact that the program is a leader in the United States and is in 40 other countries around the world. The TIPS curriculum not only teaches what is contained in state law, but it also places a strong emphasis on what is known as intervention procedures. By focusing on intervention procedures, students are provided, by way of video reenactments and/or role playing, scenarios they may encounter in real life when serving alcohol. This type of training is critically important, because it provides students with the confidence they need to address a variety of situations that they may face while on the job. We believe that allowing the TIPS program to be an additional option for those who wish to be RAMP certified will be beneficial to the Commonwealth.

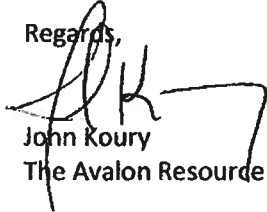
Upon reading the proposed regulations and considering how they will impact our businesses, we suggest some minor recommendations that will provide us, as small business owners, with a clearer and more predictable process through which we would undergo to become RAMP certified. Attached to this letter, you will find suggested enhancements which were previously submitted by Health Communications Incorporated which is the creator of the TIPS program.

The first of our suggested changes would clarify the point that our training program may exceed what is prescribed for by the PLCB's Bureau of Alcohol Education's standard curriculum. We believe that teaching above and beyond what is in the scope of the standard curriculum is a positive change that will allow for the use of our intervention procedures training of which we are extremely proud. The other two changes clarify the process through which we would seek RAMP certification. We further suggest that if an entity's curriculum is found to be deficient by the PLCB, then we recommend that a written

response by the PLCB be sent directly to the training company outlining the reason(s) why the curriculum did not meet the Board's standards. We also feel it is important that the response be provided to the applicant within 60 days so as to provide business owners with an expectation that they will receive a response in a reasonable amount of time. Our changes would not only help TIPS but others in the training of alcohol service personnel.

We graciously and humbly ask for your favorable consideration of the aforementioned suggested changes which would enhance the PLCB's proposed regulation #54-79. Again, we thank you for your time and effort to address these regulation changes for the betterment of the entire industry.

Regards,

A handwritten signature in black ink, appearing to read 'JK', with a long horizontal line extending to the right.

John Koury
The Avalon Resource Group