

Comments of the Independent Regulatory Review Commission



Pennsylvania Liquor Control Board Regulation #54-84 (IRRC #3098)

Right To Occupy

July 29, 2015

We submit for your consideration the following comments on the proposed rulemaking published in the May 30, 2015 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (RRA) (71 P.S. § 745.5b). Section 5.1(a) of the RRA (71 P.S. § 745.5a(a)) directs the Pennsylvania Liquor Control Board (Board) to respond to all comments received from us or any other source.

Implementation.

In the event that a casino owner engages a management company to operate the casino or enters into an agreement to occupy with a commonly owned real estate investment trust, would this regulation have an impact? We ask the Board to discuss this regulation with the Pennsylvania Gaming Control Board (Gaming Control Board) prior to submitting the final-form regulation to ensure that the regulation does not create issues for the Gaming Control Board.