

3236



Mr. Rodrigo Diaz, Chief Counsel  
Office of Chief Counsel  
Pennsylvania Liquor Control Board  
Room 401  
Northwest Office Building  
Harrisburg, PA 17134-001



19 AUG 16 PM 1:07  
OFFICE OF CHIEF COUNSEL  
PLCB

August 15, 2019

RE: Proposed Regulation Changes, 40 Pa. Code Chapter 5

Dear Mr. Diaz,

First, eStrategy Solutions, (eSS), the first and largest PLCB-approved online RAMP Training provider, applauds the effort to clarify the difference between mandatory RAMP Training and voluntary RAMP Certification. Based on our experience, we agree that there is still substantial confusion among licensees and, in addition to the actual course content that explains the entire RAMP Certification process, we have always taken steps to carefully explain the difference and the implications to the licensee, both on our website, [www.ramptraining.com](http://www.ramptraining.com), and in conversations held directly with managers of licensee businesses.

Second, eSS would like to suggest that the proposed time-based restriction for RAMP Training vouchers, Section 5.226, is problematic in the following ways:

- The sale of training vouchers, along with other training transaction types, is a business practice decision made by eSS and others as a way of serving licensee customers well. We do not believe it is within the purview of the Commonwealth of Pennsylvania to dictate business practices to the private sector.
- Limiting the time that vouchers are valid will present hardship to licensee businesses that purchase the vouchers for distribution to their employees in several ways:
  - More time spent throughout the year managing the voucher purchase and employee distribution process
  - Loss of tiered volume discounts currently enjoyed by many licensees, increasing the cost per employee for RAMP Training
  - The proposed 60-day voucher validity term will not accomplish potential elimination of lost value to licensees should an approved training provider lose their approval from PLCB.
  - Voucher purchasers often buy more than needed at a given time for the sake of convenience, obtaining discounts as mentioned, and as a safeguard to have them on hand when needed for unexpected employee attrition. In these cases, the licensee would be financially penalized by having the pre-purchased vouchers expire, rendering them useless



- Regardless of any other considerations imposed by the Commonwealth, effective civil remedies are already available to the licensee should the licensee find itself in need of recourse against any vendor.

It is of course a reasonable business practice to refund a licensee for unused vouchers in the case of losing PLCB RAMP provider approval, and any business with integrity will do so without regulatory intervention. eSS suggests that the voucher limit provision of these proposed regulation changes is a solution WITHOUT a problem and should be removed from the regulations update.

eStrategy Solutions, Inc. wishes to remain apprised of all future developments regarding these proposed regulation changes. Please provide updates to:

Stephen J. Matt, COO  
eStrategy Solutions, Inc.  
6601 Vaught Ranch Road, Suite 100  
Austin, TX 78730  
[smatt@estrategysolutions.com](mailto:smatt@estrategysolutions.com)

Sincerely,

A handwritten signature in black ink that reads "Stephen J. Matt".

Stephen J. Matt

Cc: John Matthews, CEO, eStrategy Solutions, Inc.