

0:00:00.439,0:00:07.379

trade practice document has that

0:00:03.210,0:00:11.880

available it is available for respective

0:00:07.379,0:00:17.240

members of nab CA and NC SLA through nab

0:00:11.880,0:00:20.400

k org and nab CA I'm Sue's me NC SLA org

0:00:17.240,0:00:22.020

some housekeeping before we begin if you

0:00:20.400,0:00:25.529

are experiencing any technical

0:00:22.020,0:00:29.070

difficulties please contact citrix

0:00:25.529,0:00:33.300

customer service directly at eight five

0:00:29.070,0:00:36.660

five three five two nine zero zero two

0:00:33.300,0:00:40.739

that's eight five five three five two

0:00:36.660,0:00:45.030

nine zero zero two and give them webinar

0:00:40.739,0:00:48.390

ID number one zero four two zero five

0:00:45.030,0:00:51.870

three seven nine that's webinar ID

0:00:48.390,0:00:56.100

number one zero four two zero five three

0:00:51.870,0:00:58.140

seven nine so we expect this webinar to

0:00:56.100,0:01:01.230

last about one hour with room for

0:00:58.140,0:01:03.090

question and answer at the end if there

0:01:01.230,0:01:05.129
are a lot of questions and if attendees

0:01:03.090,0:01:05.640
don't mind we may stay on a little

0:01:05.129,0:01:08.189
longer

0:01:05.640,0:01:09.869
please know that once the webinar begins

0:01:08.189,0:01:12.000
I'm not able to acknowledge receipt of

0:01:09.869,0:01:14.580
questions but know that Pam will answer

0:01:12.000,0:01:16.770
questions at the end if you have a

0:01:14.580,0:01:18.659
question please type it in the chat

0:01:16.770,0:01:22.080
window in the lower right corner of your

0:01:18.659,0:01:24.590
screen at the end of the presentation I

0:01:22.080,0:01:29.009
will ask the questions on your behalf

0:01:24.590,0:01:32.610
this webinar is being recorded and will

0:01:29.009,0:01:34.860
be available later through nab CA org

0:01:32.610,0:01:38.119
you will find it under the resources tab

0:01:34.860,0:01:44.759
just look for webinars in the drop-down

0:01:38.119,0:01:48.960
list that appears so I'm going to

0:01:44.759,0:01:50.750

introduce Pam Erickson our speaker for

0:01:48.960,0:01:54.509
today

0:01:50.750,0:01:58.500
Pam is a passionate leader on alcohol

0:01:54.509,0:02:01.350
issues currently she owns public action

0:01:58.500,0:02:03.630
management which operates an education

0:02:01.350,0:02:06.290
campaign for a healthy alcohol

0:02:03.630,0:02:06.290
marketplace

0:02:07.569,0:02:15.230
from 1996 to 2003 she directed the

0:02:13.100,0:02:18.770
Oregon Liquor Control Commission which

0:02:15.230,0:02:22.640
included operating the Oregon Oregon's

0:02:18.770,0:02:27.160
distilled spirits business from 2003 to

0:02:22.640,0:02:30.230
2007 she worked at the Oregon

0:02:27.160,0:02:33.410
partnership to direct leadership and

0:02:30.230,0:02:37.280
media campaigns to reduce underage

0:02:33.410,0:02:39.830
drinking her education campaign is

0:02:37.280,0:02:42.650
designed to explain the purpose and

0:02:39.830,0:02:45.410
objectives of alcohol regulation in

0:02:42.650,0:02:48.380
simple terms she has developed several

0:02:45.410,0:02:51.350
reports on deregulation in the United

0:02:48.380,0:02:53.989
Kingdom and the u.s. and annually

0:02:51.350,0:02:57.110
produces a report for policy makers

0:02:53.989,0:03:00.560
called issue briefs these reports

0:02:57.110,0:03:03.530
explain how deregulation can lead to

0:03:00.560,0:03:06.799
increased social problems such as high

0:03:03.530,0:03:10.570
rates of underage drinking Public Order

0:03:06.799,0:03:13.820
offenses and alcohol-related diseases

0:03:10.570,0:03:17.329
recently she launched a series of short

0:03:13.820,0:03:21.380
reports the latest one is number three

0:03:17.329,0:03:24.980
Fairtrade practice regulations pam has

0:03:21.380,0:03:27.739
also served as an expert witness in key

0:03:24.980,0:03:30.980
alcohol regulation cases in Kentucky and

0:03:27.739,0:03:35.680
California her educational materials are

0:03:30.980,0:03:38.030
available at [healthy alcohol market.com](http://healthyalcoholmarket.com)

0:03:35.680,0:03:40.549
so I'm now going to turn the

0:03:38.030,0:03:42.890
presentation over to Pam and I would

0:03:40.549,0:03:45.049
appreciate your patience with some

0:03:42.890,0:03:47.959
possible technical difficulties that we

0:03:45.049,0:03:49.760
may experience so Pam have just changed

0:03:47.959,0:03:53.299
the presenter to you if you can pull up

0:03:49.760,0:03:57.590
your powerpoint so that we can see your

0:03:53.299,0:03:59.209
screen and begin the presentation okay

0:03:57.590,0:04:01.940
Maggie

0:03:59.209,0:04:05.299
thank you so much for the opportunity to

0:04:01.940,0:04:09.049
talk about this very important but

0:04:05.299,0:04:14.299
somewhat complex area Maggie do you have

0:04:09.049,0:04:20.519
my screen up I do not see your screen I

0:04:14.299,0:04:24.160
see the the welcome screen how about now

0:04:20.519,0:04:27.130
no I don't see that I don't see your

0:04:24.160,0:04:29.560
screen either what I may have to do is

0:04:27.130,0:04:34.090
just take the control back and run

0:04:29.560,0:04:36.390

through the slides on my on my side how

0:04:34.090,0:04:40.810
about now

0:04:36.390,0:04:44.820
nope still no okay well then I think

0:04:40.810,0:04:48.610
that maybe you'll need to do the slides

0:04:44.820,0:04:50.860
yeah let me take it back so can you see

0:04:48.610,0:04:54.700
can you see the can okay

0:04:50.860,0:05:04.450
great so I'll I'll I'll Drive the bus if

0:04:54.700,0:05:09.730
you will okay first let's let me talk

0:05:04.450,0:05:13.390
about the objectives of this webinar and

0:05:09.730,0:05:16.660
I want to talk a little bit about why

0:05:13.390,0:05:19.030
these are important honesty and fair

0:05:16.660,0:05:22.060
dealing have always been a critical

0:05:19.030,0:05:24.870
factor in alcohol regulation and I think

0:05:22.060,0:05:27.490
you can see it today as states are

0:05:24.870,0:05:30.130
attempting to legalize marijuana it's

0:05:27.490,0:05:33.700
very important to have people who are in

0:05:30.130,0:05:36.580
the business who are honest who play

0:05:33.700,0:05:40.720
fairly and things are pretty transparent

0:05:36.580,0:05:45.150
that is just as important in alcohol

0:05:40.720,0:05:47.950
sales but oftentimes we hear a lot of

0:05:45.150,0:05:49.090
criticisms of fair trade practice laws

0:05:47.950,0:05:50.919
in alcohol

0:05:49.090,0:05:53.740
they're called Prohibition era

0:05:50.919,0:05:56.890
regulations not relevant today they just

0:05:53.740,0:05:59.620
get in the way of business people say

0:05:56.890,0:06:01.570
that alcohol is a quote legal product

0:05:59.620,0:06:05.800
unquote and therefore should be sold

0:06:01.570,0:06:08.710
without regulation alcohol regulation

0:06:05.800,0:06:11.919
should be aimed at the public at public

0:06:08.710,0:06:13.630
safety and these a lot of people's

0:06:11.919,0:06:17.140
opinions have nothing to do with the

0:06:13.630,0:06:21.729
public film escape but these things are

0:06:17.140,0:06:24.220
are not true originally these ones were

0:06:21.729,0:06:27.190
developed with an eye for public health

0:06:24.220,0:06:29.860

and safety and it's they are very

0:06:27.190,0:06:33.100

important but they're unfortunately

0:06:29.860,0:06:36.370

poorly understood so I did

0:06:33.100,0:06:40.720

of this webinar and a report on these

0:06:36.370,0:06:44.140

issues to try to simplify this so people

0:06:40.720,0:06:46.450

can have an understanding and I am

0:06:44.140,0:06:48.400

reminded that in my seven years as a

0:06:46.450,0:06:52.660

regulator I only had a vague

0:06:48.400,0:06:54.700

understanding of these laws and I have

0:06:52.660,0:06:56.770

come to believe they're very important

0:06:54.700,0:07:00.970

but they're really hard for people to

0:06:56.770,0:07:04.870

use and understand but I want to go back

0:07:00.970,0:07:06.670

in history and explain why we have them

0:07:04.870,0:07:10.920

how they came about and what they aren't

0:07:06.670,0:07:16.840

designed to do next slide

0:07:10.920,0:07:19.600

it begins with before prohibition before

0:07:16.840,0:07:23.950

prohibition we had huge problems with

0:07:19.600,0:07:26.740
alcohol if you look at history you find

0:07:23.950,0:07:30.010
that Americans were very heavy drinkers

0:07:26.740,0:07:32.380
in 1830 Americans drank an average of

0:07:30.010,0:07:36.310
seven gallons of pure alcohol compared

0:07:32.380,0:07:38.500
j'en 2.3 today and regulation was

0:07:36.310,0:07:40.890
basically non-existent we really didn't

0:07:38.500,0:07:44.950
have much in the way of regulation

0:07:40.890,0:07:48.580
alcohol was sold primarily in bars

0:07:44.950,0:07:51.970
called saloons and we're virtually all

0:07:48.580,0:07:56.070
what was called tied house which meant

0:07:51.970,0:08:00.280
that they were really owned by a

0:07:56.070,0:08:05.380
national supplier so a national supplier

0:08:00.280,0:08:08.830
would be a big company it's a large

0:08:05.380,0:08:17.290
enterprise that supply alcohol products

0:08:08.830,0:08:21.010
and they would then and each of these

0:08:17.290,0:08:24.510
saloons I sell that particular supplier

0:08:21.010,0:08:27.850

product and so each national

0:08:24.510,0:08:32.410

manufacturer or supplier had to have a

0:08:27.850,0:08:35.260

separate saloon in many many communities

0:08:32.410,0:08:38.789

it was amazing how many saloons we had

0:08:35.260,0:08:41.589

even in very small communities

0:08:38.789,0:08:43.930

competition was really fierce and there

0:08:41.589,0:08:45.910

was a there were a lot of methods used

0:08:43.930,0:08:52.440

to induce people

0:08:45.910,0:08:55.840

as much possible gambling prostitution

0:08:52.440,0:09:03.160

special deals people could pledge their

0:08:55.840,0:09:07.390

paycheck home this spawned very heavy

0:09:03.160,0:09:10.870

drinking problems became a major social

0:09:07.390,0:09:13.450

issue public disorder intoxication

0:09:10.870,0:09:15.850

addiction family wages wandered

0:09:13.450,0:09:20.260

prostitution gambling all of those were

0:09:15.850,0:09:23.610

huge problems and they led to a fairly

0:09:20.260,0:09:29.290

extreme solution which was prohibition

0:09:23.610,0:09:32.880
next after prohibition those who were

0:09:29.290,0:09:36.640
involved in establishing regulations

0:09:32.880,0:09:39.130
really had in mind that they did not

0:09:36.640,0:09:42.330
want the market conditions to return

0:09:39.130,0:09:44.890
that had spawned the social problems and

0:09:42.330,0:09:47.410
at you're at the side of the screen

0:09:44.890,0:09:52.090
there's a quote from a book called

0:09:47.410,0:09:56.200
toward liquor control it was the a book

0:09:52.090,0:09:59.650
that that displayed the results of a

0:09:56.200,0:10:02.500
long-term study of alcohol regulatory

0:09:59.650,0:10:05.320
systems throughout the world it was

0:10:02.500,0:10:09.370
called word liquor control by Fosdick

0:10:05.320,0:10:12.130
and Scott and in this book you find his

0:10:09.370,0:10:15.010
quote the tide house system had all the

0:10:12.130,0:10:17.440
vices of absentee ownership the

0:10:15.010,0:10:19.510
manufacturer cared not knew nothing and

0:10:17.440,0:10:21.940

cared nothing about the community all he

0:10:19.510,0:10:24.370

wanted was increased sales he saw none

0:10:21.940,0:10:27.460

of the abuses as a non-resident

0:10:24.370,0:10:31.150

he was beyond local social influence

0:10:27.460,0:10:34.450

that's actually why you see some in some

0:10:31.150,0:10:37.210

states they have residency laws because

0:10:34.450,0:10:40.600

they don't want a problem of the

0:10:37.210,0:10:44.230

absentee owner who cares only about

0:10:40.600,0:10:47.710

sales and as a regulator I can tell you

0:10:44.230,0:10:50.650

that it's a lot easier to deal with a

0:10:47.710,0:10:54.190

licensee that's in your state versus

0:10:50.650,0:10:58.600

someone that is actually a national

0:10:54.190,0:10:59.230

operator or even today a global operator

0:10:58.600,0:11:05.110

with the head

0:10:59.230,0:11:07.570

orders outside the country so after

0:11:05.110,0:11:10.110

prohibition the 21st amendment gave a

0:11:07.570,0:11:13.090

primary duty of regulation to the states

0:11:10.110,0:11:17.590

there is some federal regulations of the

0:11:13.090,0:11:20.640

primary responsibility and as you saw

0:11:17.590,0:11:23.080

prohibition was a federal response a

0:11:20.640,0:11:26.800

one-size-fits-all there's a recognition

0:11:23.080,0:11:29.680

that that that didn't work very well

0:11:26.800,0:11:33.970

that we need to allow some variation by

0:11:29.680,0:11:37.270

state toward liquor control really

0:11:33.970,0:11:40.780

provided a blueprint for how to regulate

0:11:37.270,0:11:42.370

and you have to recognize that states

0:11:40.780,0:11:45.160

really didn't know anything about

0:11:42.370,0:11:47.080

regulation and didn't didn't really have

0:11:45.160,0:11:48.700

any experience with it before

0:11:47.080,0:11:51.820

prohibition there was very little

0:11:48.700,0:11:54.600

regulation or course during Prohibition

0:11:51.820,0:11:58.240

it was a completely unregulated market

0:11:54.600,0:12:01.330

but though those who were involved in

0:11:58.240,0:12:04.210

the in the task of developing

0:12:01.330,0:12:06.820

regulations found that the market

0:12:04.210,0:12:10.390

practices that fueled alcohol problems

0:12:06.820,0:12:13.000

would never return and this led to a

0:12:10.390,0:12:16.420

comprehensive regulatory system that's

0:12:13.000,0:12:19.240

really unique in the world and actually

0:12:16.420,0:12:22.930

pre effective in terms of curbing

0:12:19.240,0:12:26.200

consumption of problems and it has

0:12:22.930,0:12:30.940

several mechanisms one is a three-tiered

0:12:26.200,0:12:34.080

system of licensure licensure um fair

0:12:30.940,0:12:38.170

trade trade practice regulations and

0:12:34.080,0:12:40.030

licensing system can use a football

0:12:38.170,0:12:42.700

analogy everybody seems to use football

0:12:40.030,0:12:45.250

analogies these days the three-tiered

0:12:42.700,0:12:47.770

system is the structure like a football

0:12:45.250,0:12:50.740

field with boundaries and lines the

0:12:47.770,0:12:53.290

trade practiced regulations are like

0:12:50.740,0:12:56.220

rulebook all licensed business was

0:12:53.290,0:13:00.600

follow state and federal rules and just

0:12:56.220,0:13:04.090

like my reads state and federal agency

0:13:00.600,0:13:09.040

employees are there to enforce the

0:13:04.090,0:13:12.190

regulations the the three-tiered system

0:13:09.040,0:13:12.649

again is unique in the world there are

0:13:12.190,0:13:14.749

few

0:13:12.649,0:13:16.459

places that have free cured systems but

0:13:14.749,0:13:19.040

most don't

0:13:16.459,0:13:23.149

it is a regulatory structure of closed

0:13:19.040,0:13:25.790

product sale so a manufacturer has to be

0:13:23.149,0:13:28.790

licensed they can only sell their

0:13:25.790,0:13:31.790

product to a licensed distributor who

0:13:28.790,0:13:36.259

can only sell the product to an licensed

0:13:31.790,0:13:38.740

retailer each system is - is usually

0:13:36.259,0:13:41.929

required to be independent of the other

0:13:38.740,0:13:44.389

the three-tier system is designed to

0:13:41.929,0:13:46.519

prevent what's called vertical vertical

0:13:44.389,0:13:50.990

integration which is a form of

0:13:46.519,0:13:55.670

monopolies where the manufacturer and

0:13:50.990,0:13:58.759

the supplier the manufacturers supplier

0:13:55.670,0:14:02.350

an retailer are basically one business

0:13:58.759,0:14:05.240

on one business arrangement and they can

0:14:02.350,0:14:07.809

dominate the market and use whatever

0:14:05.240,0:14:10.579

sales tactics they can get away with

0:14:07.809,0:14:13.279

through that but there are two other

0:14:10.579,0:14:16.009

benefits of the system that are not well

0:14:13.279,0:14:18.769

known but they're really valuable one is

0:14:16.009,0:14:21.649

that we have very safe products in other

0:14:18.769,0:14:24.589

countries you often see stories about

0:14:21.649,0:14:28.160

people dying from illegal tainted

0:14:24.589,0:14:30.230

alcohol that almost never happens in our

0:14:28.160,0:14:33.889

country because of this closed system

0:14:30.230,0:14:36.379

and it is the distributor's job to track

0:14:33.889,0:14:39.769

every bottling can and when there's any

0:14:36.379,0:14:41.689

kind of problem it's relatively easy to

0:14:39.769,0:14:43.309

quickly pull these products from the

0:14:41.689,0:14:46.790

shelves so that no customers aren't

0:14:43.309,0:14:50.540

heard the sign benefit is very high tax

0:14:46.790,0:14:53.870

collections in other countries they lose

0:14:50.540,0:14:56.660

a third to a half of the potential

0:14:53.870,0:14:59.449

revenue through leakages in a system we

0:14:56.660,0:15:02.120

have almost no leakage and close to 100%

0:14:59.449,0:15:08.170

tax collections so there are a couple of

0:15:02.120,0:15:08.170

kind of unknown benefits for our system

0:15:09.459,0:15:16.759

fair trade practice regulations I've

0:15:13.189,0:15:19.990

divided them into five types financial

0:15:16.759,0:15:23.270

ties sometimes called tie house laws

0:15:19.990,0:15:26.930

exclusive outlet or business

0:15:23.270,0:15:31.520

raiments commercial bribery consignment

0:15:26.930,0:15:33.260

sales and hair or uniform pricing now

0:15:31.520,0:15:37.430

we'll deal with each of those in some

0:15:33.260,0:15:42.110

detail laws prohibiting financial ties

0:15:37.430,0:15:45.590

or things of value there are tight house

0:15:42.110,0:15:49.300

laws in federal and state law basically

0:15:45.590,0:15:53.180

they prohibit ties between the tiers

0:15:49.300,0:15:56.170

involving ownership investment loans or

0:15:53.180,0:15:59.920

providing things of value now each state

0:15:56.170,0:16:02.630

will have their own set of laws and

0:15:59.920,0:16:05.840

while they may be variations on theme

0:16:02.630,0:16:08.260

each state does have different laws but

0:16:05.840,0:16:12.770

they are all to some degree or another

0:16:08.260,0:16:16.300

regulate things of value again because

0:16:12.770,0:16:18.920

these kinds of ties between a

0:16:16.300,0:16:24.170

manufacturer distributor and retailer

0:16:18.920,0:16:26.090

lead to Bertil vertical integration you

0:16:24.170,0:16:28.490

should understand that financial ties

0:16:26.090,0:16:31.340
are a common business practice with

0:16:28.490,0:16:35.840
other products the soda aisle for

0:16:31.340,0:16:40.910
example usually has one type of only a

0:16:35.840,0:16:45.350
couple of different products but let's

0:16:40.910,0:16:51.890
go on to the next one exclusive business

0:16:45.350,0:16:53.990
arrangements this prohibits favorable

0:16:51.890,0:16:58.940
business deals and it's usually a price

0:16:53.990,0:17:01.460
break offered to one retailer or to a

0:16:58.940,0:17:04.790
group of retailers but not to everyone

0:17:01.460,0:17:09.140
and it usually involves buying less

0:17:04.790,0:17:11.770
product competitor exclusive deals are

0:17:09.140,0:17:15.350
very common with other commodities

0:17:11.770,0:17:19.130
sometimes you'll go to a particular

0:17:15.350,0:17:22.040
venue and they will only have Coke

0:17:19.130,0:17:24.470
products or Pepsi products I've always

0:17:22.040,0:17:26.480
thought it was curious when you go to a

0:17:24.470,0:17:30.440
restaurant and order and coke and they

0:17:26.480,0:17:33.140

say well Pepsi me okay that means they

0:17:30.440,0:17:36.240

have an exclusive arrangement with Pepsi

0:17:33.140,0:17:39.800

to only sell Pepsi products

0:17:36.240,0:17:42.630

not co-products and likely they got that

0:17:39.800,0:17:46.200

exclusive arrangement through some sort

0:17:42.630,0:17:48.990

of price break so these are common and

0:17:46.200,0:17:51.870

not illegal with other commodities but

0:17:48.990,0:17:55.950

it is not generally speaking a legal

0:17:51.870,0:17:59.520

legal practice with alcohol and

0:17:55.950,0:18:02.070

interestingly enough this practice these

0:17:59.520,0:18:04.500

laws have actually fostered a

0:18:02.070,0:18:05.330

flourishing craft beer business in the

0:18:04.500,0:18:07.980

US

0:18:05.330,0:18:10.860

whereas craft beer can't get to market

0:18:07.980,0:18:11.520

in any other countries and this is what

0:18:10.860,0:18:14.630

happens

0:18:11.520,0:18:17.330

Mexico is a good example where most

0:18:14.630,0:18:21.300
retailers have an exclusive agreement

0:18:17.330,0:18:26.340
with one of the two large air companies

0:18:21.300,0:18:28.500
and craft products simply can't get into

0:18:26.340,0:18:31.380
a store or bar because of those

0:18:28.500,0:18:34.830
exclusive arrangements Mexico's

0:18:31.380,0:18:37.890
Competition Commission ruled that some

0:18:34.830,0:18:41.070
of those already illegal that was just a

0:18:37.890,0:18:44.250
couple of years ago so the craft beer

0:18:41.070,0:18:46.530
industry in Mexico has had a very hard

0:18:44.250,0:18:52.350
time getting anywhere with their

0:18:46.530,0:18:54.300
products next commercial bribery is

0:18:52.350,0:18:58.050
pretty much what it sounds like it's

0:18:54.300,0:19:00.270
cash or gifts or gift cards that are

0:18:58.050,0:19:02.490
given to the owner or one of the

0:19:00.270,0:19:06.360
employees sometimes it's surreptitiously

0:19:02.490,0:19:08.610
to an employee but honestly there is a

0:19:06.360,0:19:11.340
trade off I'll give you this gift and

0:19:08.610,0:19:14.190
then I expect that you provide my

0:19:11.340,0:19:17.540
products over others that you give my

0:19:14.190,0:19:23.730
products or any special treatment

0:19:17.540,0:19:27.720
next one consignment sales consignment

0:19:23.730,0:19:31.590
sales represents an incomplete sale and

0:19:27.720,0:19:35.220
tends to perpetually deny the retailer

0:19:31.590,0:19:39.230
witness of liar it's incomplete because

0:19:35.220,0:19:42.419
the retailer can return unsold products

0:19:39.230,0:19:46.409
but it often results in as it

0:19:42.419,0:19:49.080
where the retailer is pushed into

0:19:46.409,0:19:52.950
ordering more product and really can

0:19:49.080,0:19:55.889
sell and oftentimes then the retailer is

0:19:52.950,0:19:59.369
pressured into fire selling selling it

0:19:55.889,0:20:02.779
and bumping up consumption so that's

0:19:59.369,0:20:09.269
kind of what consignment sales are and

0:20:02.779,0:20:14.820
finally we have pricing fair pricing

0:20:09.269,0:20:17.159

regulations the federal alcohol laws do

0:20:14.820,0:20:19.679

not have pricing laws but there are

0:20:17.159,0:20:23.009

federal pricing laws for example the

0:20:19.679,0:20:27.600

federal robinson-patman Act does require

0:20:23.009,0:20:30.480

fair pricing so a supplier of really any

0:20:27.600,0:20:35.809

commodity is supposed to give the same

0:20:30.480,0:20:38.609

price to similarly situated retailers in

0:20:35.809,0:20:41.759

state law there are states that have

0:20:38.609,0:20:44.730

what's called a uniform pricing law or

0:20:41.759,0:20:47.460

a ban on price discrimination and

0:20:44.730,0:20:51.600

basically it means that distributors are

0:20:47.460,0:20:55.789

supposed to offer their whole bank of

0:20:51.600,0:20:58.980

products at the same price to everybody

0:20:55.789,0:21:02.730

now some states now allow it's called

0:20:58.980,0:21:06.389

channel pricing Arizona for example has

0:21:02.730,0:21:08.879

a two channel pricing system so they

0:21:06.389,0:21:13.190

have to the distributor has to offer the

0:21:08.879,0:21:17.220

same price to all those that are

0:21:13.190,0:21:21.720

off-premise retailers those stores and

0:21:17.220,0:21:24.090

and that kind of thing they can have a

0:21:21.720,0:21:27.960

different price structure over the bars

0:21:24.090,0:21:31.710

taverns restaurants which are called on

0:21:27.960,0:21:34.859

premise channel but that's it it's only

0:21:31.710,0:21:37.139

two sets of prices and within those

0:21:34.859,0:21:41.700

categories and have to offer the same

0:21:37.139,0:21:44.190

price to everybody this we this reduces

0:21:41.700,0:21:47.999

the incentive to sell at discount and

0:21:44.190,0:21:52.679

it's particularly important for local

0:21:47.999,0:21:55.010

communities because if large companies

0:21:52.679,0:21:58.520

are able to sell it does

0:21:55.010,0:22:02.650

it can squeeze them out of business and

0:21:58.520,0:22:11.060

so and eventually dominate the market

0:22:02.650,0:22:14.810

next there are a lot of exceptions to

0:22:11.060,0:22:17.990
these laws in business why and let me

0:22:14.810,0:22:19.910
give you a little background on it there

0:22:17.990,0:22:22.540
is certainly a legitimate need for

0:22:19.910,0:22:25.670
advertising and promotion of products

0:22:22.540,0:22:29.660
all three segments of the alcohol

0:22:25.670,0:22:32.930
industry now have a lot of new products

0:22:29.660,0:22:35.720
and sometimes a third to a half of all

0:22:32.930,0:22:38.420
their revenue comes from new products if

0:22:35.720,0:22:41.480
you can't advertise a new product no one

0:22:38.420,0:22:44.360
will even know to buy it so advertising

0:22:41.480,0:22:47.030
is really critical a second thing that's

0:22:44.360,0:22:49.790
happened is that the average advertising

0:22:47.030,0:22:51.350
business has dramatically changed it

0:22:49.790,0:22:54.220
used to be that you would advertise

0:22:51.350,0:22:58.760
products in major media TV radio print

0:22:54.220,0:23:01.220
well those are all changed with TV and

0:22:58.760,0:23:04.970
radio stations are are now in the

0:23:01.220,0:23:07.430

hundreds and the print media has

0:23:04.970,0:23:10.580

dramatically changed so it's very

0:23:07.430,0:23:14.300

difficult to use major media anymore and

0:23:10.580,0:23:16.850

it's very very costly it's very hard to

0:23:14.300,0:23:21.380

target your specific customer base

0:23:16.850,0:23:24.470

through major media anymore so me is so

0:23:21.380,0:23:28.910

advertising and promotion of alcohol

0:23:24.470,0:23:34.130

products has moved in store in the bar

0:23:28.910,0:23:36.950

or into events and so it's really quite

0:23:34.130,0:23:40.820

different and often times you get into

0:23:36.950,0:23:43.730

situations where in order to promote and

0:23:40.820,0:23:46.100

advertise an event for example you're

0:23:43.730,0:23:50.390

going to get into things that value kind

0:23:46.100,0:23:53.840

of black wire so it's important to try

0:23:50.390,0:23:56.920

to conceptualize and separate out those

0:23:53.840,0:23:59.870

things that are really legitimate

0:23:56.920,0:24:02.630

advertising and promotion activities

0:23:59.870,0:24:06.450

versus just trying to buy your way into

0:24:02.630,0:24:09.380

a market through favors and

0:24:06.450,0:24:15.720

special deals and that kind of thing

0:24:09.380,0:24:18.630

next so what happens when trade practice

0:24:15.720,0:24:21.780

regulations are violated if you have a

0:24:18.630,0:24:24.210

single instance or of somebody providing

0:24:21.780,0:24:26.540

and thing of value to a tavern in a

0:24:24.210,0:24:29.790

rural location it only happens once

0:24:26.540,0:24:33.120

that's unlikely to create social

0:24:29.790,0:24:36.210

problems it's when these things go on

0:24:33.120,0:24:38.160

and become very widespread then you have

0:24:36.210,0:24:41.160

a dramatic change in your marketplace

0:24:38.160,0:24:45.150

and it's very difficult to get it back

0:24:41.160,0:24:52.920

on get back into a balanced marketplace

0:24:45.150,0:24:56.550

situation so continued use of discounts

0:24:52.920,0:24:58.530

and freebies eventually tie the retailer

0:24:56.550,0:25:01.620

to the supplier and the pressures or

0:24:58.530,0:25:03.380

increased sales continues so it's

0:25:01.620,0:25:07.710

important to remember that these

0:25:03.380,0:25:11.490

freebies are are not just free they come

0:25:07.710,0:25:13.770

with an expectation that you retailer

0:25:11.490,0:25:17.210

are going to havior my product in some

0:25:13.770,0:25:20.640

way you're going to use the discounted

0:25:17.210,0:25:23.520

purchase price to drop your prices and

0:25:20.640,0:25:26.580

induce greater sales of my product and

0:25:23.520,0:25:28.860

as more and more retailers get involved

0:25:26.580,0:25:31.580

these kinds of things then you have a

0:25:28.860,0:25:36.930

huge amount of people that are

0:25:31.580,0:25:39.240

attempting to sales in and eventually

0:25:36.930,0:25:42.150

social problems will follow and they

0:25:39.240,0:25:45.990

will become very widespread it's also

0:25:42.150,0:25:48.420

important to remember that usually these

0:25:45.990,0:25:51.090

price breaks aren't for your local

0:25:48.420,0:25:53.370
mom-and-pop therefore the big venues

0:25:51.090,0:25:57.330
that are really going to chase up sales

0:25:53.370,0:26:00.600
so you are as small operators will be a

0:25:57.330,0:26:02.640
great disadvantage and eventually you'll

0:26:00.600,0:26:08.220
have a market dominated by just a few

0:26:02.640,0:26:11.340
players next so let's look at a couple

0:26:08.220,0:26:15.050
of examples of what happens when you

0:26:11.340,0:26:20.190
have trade practice violations and

0:26:15.050,0:26:22.770
example one it involves a supply

0:26:20.190,0:26:24.930
in a large bar that agreed to host an

0:26:22.770,0:26:27.870
event which will feature the suppliers

0:26:24.930,0:26:31.020
products the supplier will provide

0:26:27.870,0:26:34.170
discount product and a fairly high

0:26:31.020,0:26:37.650
volume on because they expect a lot of

0:26:34.170,0:26:40.110
attendees okay for event event

0:26:37.650,0:26:42.780
advertising they'll pay for it you can

0:26:40.110,0:26:45.600

entertainment either a band popular

0:26:42.780,0:26:47.970
event or DJ'd and they'll pay for things

0:26:45.600,0:26:51.390
like extra seating extra drinks eight

0:26:47.970,0:26:54.900
sessions promotional signs and that kind

0:26:51.390,0:26:57.420
of thing and let's say that this event

0:26:54.900,0:27:00.660
goes on as expected if you're large

0:26:57.420,0:27:05.730
crowds and major sales but oftentimes

0:27:00.660,0:27:08.640
when you have large crowds and increase

0:27:05.730,0:27:10.170
sales especially discounted drinks and

0:27:08.640,0:27:13.290
that kind of thing

0:27:10.170,0:27:16.800
you also get fights dui's neighborhood

0:27:13.290,0:27:19.650
disturbance an extreme and extra law

0:27:16.800,0:27:22.410
enforcement is required now as a

0:27:19.650,0:27:25.680
regulator I know that there it's

0:27:22.410,0:27:28.500
possible to manage a large bar really

0:27:25.680,0:27:30.810
well so you don't have a lot of problems

0:27:28.500,0:27:34.410
but it's a very difficult management

0:27:30.810,0:27:36.510

task and I have seen really good bars

0:27:34.410,0:27:38.850

get quickly out of control and they

0:27:36.510,0:27:44.670

change management or the manager decides

0:27:38.850,0:27:47.910

to take on vacation it's a tough job so

0:27:44.670,0:27:52.260

um so that's what can happen when you

0:27:47.910,0:27:55.440

have a single supplier that colludes

0:27:52.260,0:28:00.240

with the retailer and puts on a large

0:27:55.440,0:28:03.900

event and the fact is that for most

0:28:00.240,0:28:06.000

states supplying advertising extra stuff

0:28:03.900,0:28:09.660

is counterpart all of those things are

0:28:06.000,0:28:12.570

illegal practices let's look at a second

0:28:09.660,0:28:17.940

example and let's just kind of continue

0:28:12.570,0:28:20.670

this scenario and suppliers B and C they

0:28:17.940,0:28:24.210

notice they that this particular event

0:28:20.670,0:28:29.210

that was sponsored by supplier hey was

0:28:24.210,0:28:31.590

very successful it got large sales and

0:28:29.210,0:28:32.050

so they decided they're going to do the

0:28:31.590,0:28:34.300

same

0:28:32.050,0:28:38.890

and they were with several other bars

0:28:34.300,0:28:42.340

for more evidence large crowds are now

0:28:38.890,0:28:44.950

at several venues there are many more

0:28:42.340,0:28:47.950

and drunk patrons fighting littering and

0:28:44.950,0:28:52.900

toxication require major police and PR

0:28:47.950,0:28:55.300

services in the UK and in some us our

0:28:52.900,0:28:58.840

visitors this actually happens every

0:28:55.300,0:29:02.260

weekend with a great deal of regularity

0:28:58.840,0:29:05.200

in Scottsdale Arizona we have a large

0:29:02.260,0:29:07.960

fire district and it has been the

0:29:05.200,0:29:11.020

subject of lots of controversy and the

0:29:07.960,0:29:13.960

City Council has hasn't up in the new

0:29:11.020,0:29:17.260

ordinances changed a lot of security

0:29:13.960,0:29:21.400

measures trying to get the whole thing

0:29:17.260,0:29:23.830

under control some you really don't want

0:29:21.400,0:29:28.000

these kinds of things to get out of

0:29:23.830,0:29:29.650

control and one way to do it is to be

0:29:28.000,0:29:36.850

pretty tough on trade practice

0:29:29.650,0:29:40.210

violations next the United Kingdom is a

0:29:36.850,0:29:43.540

modern example of how market conditions

0:29:40.210,0:29:46.470

can't create social problems at one time

0:29:43.540,0:29:48.940

the United Kingdom had a very good set

0:29:46.470,0:29:51.460

alcohol regulations in fact they were a

0:29:48.940,0:29:55.600

model for a lot of our what we call

0:29:51.460,0:29:59.830

licensed states that licensed everyone

0:29:55.600,0:30:03.730

itself sold alcohol but beginning in the

0:29:59.830,0:30:06.510

1950s they slowly deregulated over about

0:30:03.730,0:30:08.590

50 just extends to the point where

0:30:06.510,0:30:11.500

personally anybody can sell alcohol

0:30:08.590,0:30:14.650

alcohol is available in fishery stores

0:30:11.500,0:30:19.750

convenience stores bars pubs taverns

0:30:14.650,0:30:20.860

restaurants and closing hours are kind

0:30:19.750,0:30:24.280

of a thing of the past

0:30:20.860,0:30:25.980

you can literally buy alcohol 24 hours a

0:30:24.280,0:30:28.240

day seven days a week

0:30:25.980,0:30:31.810

although they've started clamping down

0:30:28.240,0:30:38.530

on extended hours in some communities

0:30:31.810,0:30:41.810

but big-box grocery stores have come to

0:30:38.530,0:30:44.300

completely dominate the alcohol market

0:30:41.810,0:30:48.680

there are four large grocery chains that

0:30:44.300,0:30:53.470

really have captured about 70% of the

0:30:48.680,0:30:56.930

what's called off-premise market and

0:30:53.470,0:30:58.970

they've done it by striking deals with

0:30:56.930,0:31:02.150

suppliers they work directly with

0:30:58.970,0:31:05.180

suppliers in buying an airy high-volume

0:31:02.150,0:31:08.360

at very cheap prices and they often use

0:31:05.180,0:31:11.570

alcohol as a loss leader to bring in

0:31:08.360,0:31:14.750

patrons into their store they even

0:31:11.570,0:31:18.050

affect the on-premise market because

0:31:14.750,0:31:22.040

alcohol is so much cheaper in grocery

0:31:18.050,0:31:24.470

stores that customers have a few drinks

0:31:22.040,0:31:27.380

at home before they go out to the bars

0:31:24.470,0:31:31.100

and it's called pre drinking it has

0:31:27.380,0:31:34.520

become very popular and bar districts

0:31:31.100,0:31:37.460

have gotten really out of control the

0:31:34.520,0:31:40.970

this photo is from the United Kingdom

0:31:37.460,0:31:43.450

and many of the entertainment districts

0:31:40.970,0:31:46.340

are so out of control that enforcement

0:31:43.450,0:31:47.630

advises business not to go there because

0:31:46.340,0:31:54.350

they're too dangerous

0:31:47.630,0:31:57.320

so the UK has a much more drinking gun

0:31:54.350,0:32:00.740

in the u.s. high rates of underage

0:31:57.320,0:32:03.140

drinking in public drunkenness and huge

0:32:00.740,0:32:07.370

health problems even if you were to

0:32:03.140,0:32:11.240

clamp down and really be successful and

0:32:07.370,0:32:13.160

strength in cutting back on heavy

0:32:11.240,0:32:16.910

drinking you would still have problems

0:32:13.160,0:32:19.610

because health post eight many years to

0:32:16.910,0:32:22.130

develop in some cases and so you would

0:32:19.610,0:32:23.870

see several years of continuing health

0:32:22.130,0:32:29.300

problems even if you were able to

0:32:23.870,0:32:31.310

instantly curtail things next so what

0:32:29.300,0:32:35.720

does research say about alcohol

0:32:31.310,0:32:38.420

regulations I meant two sources for

0:32:35.720,0:32:42.440

research one is the Centers for Disease

0:32:38.420,0:32:45.800

Control community prevention taskforce

0:32:42.440,0:32:49.180

that reviews credible research and based

0:32:45.800,0:32:52.010

of those reviews make recommendations of

0:32:49.180,0:32:53.620

alcohol policies that are having the

0:32:52.010,0:32:58.059

World Health Organization

0:32:53.620,0:33:01.330

is also a good source for identifying

0:32:58.059,0:33:04.539

effective alcohol regulations and what

0:33:01.330,0:33:09.909

those organizations recommend as

0:33:04.539,0:33:13.650

effective regulations that impact the

0:33:09.909,0:33:18.510

price of alcohol so really cheap alcohol

0:33:13.650,0:33:21.460

induces consumption in social problems

0:33:18.510,0:33:24.520

reasonably balanced prices are really

0:33:21.460,0:33:27.610

kind of the way to go aggressive

0:33:24.520,0:33:31.390

promotions and numbers of outlets are

0:33:27.610,0:33:38.260

also other factors in inducing alcohol

0:33:31.390,0:33:42.100

problems it is also important to remind

0:33:38.260,0:33:44.350

people why we regulate alcohol we seem

0:33:42.100,0:33:48.549

to be in a period of kind of apathy

0:33:44.350,0:33:53.020

about alcohol harm the CDC estimates

0:33:48.549,0:33:55.899

that we lose we have 88,000 deaths

0:33:53.020,0:34:00.909

annually due to alcohol and that's from

0:33:55.899,0:34:04.990

all causes crashes poisonings liver

0:34:00.909,0:34:09.879

cirrhosis other kinds of diseases that

0:34:04.990,0:34:11.859

are alcohol induced and despite the

0:34:09.879,0:34:14.230
progress we've made on underage drinking

0:34:11.859,0:34:16.480
it's still unacceptably high we have

0:34:14.230,0:34:20.099
made great progress on this we've made

0:34:16.480,0:34:23.440
progress on drum training but it's still

0:34:20.099,0:34:26.290
unacceptably high alcohol is also a

0:34:23.440,0:34:30.010
causal factor in crime domestic problems

0:34:26.290,0:34:32.290
and other social problems it's important

0:34:30.010,0:34:36.520
to remember that we lose about 10,000

0:34:32.290,0:34:38.560
people a year due to drunk driving so we

0:34:36.520,0:34:40.929
haven't completely solved this problem

0:34:38.560,0:34:45.190
we've made great progress and we need to

0:34:40.929,0:34:47.500
continue it it's important to understand

0:34:45.190,0:34:52.330
that if a new product came onto the

0:34:47.500,0:34:55.089
market that had this much social harm we

0:34:52.330,0:34:55.780
would be it would it would engender mass

0:34:55.089,0:34:57.700
hysteria

0:34:55.780,0:35:00.640

we'd be ripping these products off the

0:34:57.700,0:35:05.010

shelf so it's important to remind people

0:35:00.640,0:35:06.550

that alcohol can cause great on them and

0:35:05.010,0:35:08.740

regulations

0:35:06.550,0:35:12.820

are actually effective and producing the

0:35:08.740,0:35:15.700

heart now let's talk a little bit about

0:35:12.820,0:35:18.370

the marketplace because a lot of the

0:35:15.700,0:35:21.480

arguments today are about the free

0:35:18.370,0:35:23.920

market and that we need to modernize our

0:35:21.480,0:35:27.840

regulations they're meant for a

0:35:23.920,0:35:30.910

different era I would say to you that

0:35:27.840,0:35:33.640

monopolies and marketplace domination is

0:35:30.910,0:35:36.430

just as much a threat today as it was in

0:35:33.640,0:35:41.200

former times if not more

0:35:36.430,0:35:43.960

this chart is it comes from the national

0:35:41.200,0:35:47.830

beer wholesalers Association but you can

0:35:43.960,0:35:51.160

see that the marketplace concentration

0:35:47.830,0:35:55.090

here has increased and the top two

0:35:51.160,0:35:58.570

companies have about 70 percent of the

0:35:55.090,0:36:02.310

market share and both of those companies

0:35:58.570,0:36:06.520

are currently in talks to merge

0:36:02.310,0:36:09.520

anheuser-busch has has a proposal to

0:36:06.520,0:36:12.400

emerge with Miller Coors whether they

0:36:09.520,0:36:16.600

will have that that combined market

0:36:12.400,0:36:19.960

share will depend on regulators who will

0:36:16.600,0:36:22.960

probably require them that some of the

0:36:19.960,0:36:28.530

resources so they are not so dominant

0:36:22.960,0:36:32.050

but still it is daunting to think that

0:36:28.530,0:36:38.080

so much of the market share is just in a

0:36:32.050,0:36:40.470

couple of companies next first of all

0:36:38.080,0:36:44.020

let's talk about the free market myth

0:36:40.470,0:36:46.690

the United States does not really have a

0:36:44.020,0:36:49.030

free market for any food drink or drug

0:36:46.690,0:36:52.300

product they are all regulated for

0:36:49.030,0:36:55.780

Public Health and Safety and certainly

0:36:52.300,0:36:59.320

you would not want to have no

0:36:55.780,0:37:04.300

regulations at all for things that we

0:36:59.320,0:37:07.060

can just too many products as it is get

0:37:04.300,0:37:11.680

through those screens and cause serious

0:37:07.060,0:37:13.960

problems such as the ice cream that had

0:37:11.680,0:37:17.290

tainted had some tainted products that

0:37:13.960,0:37:20.020

we had a spinach crisis it's really

0:37:17.290,0:37:24.040

important to regulate he's proud

0:37:20.020,0:37:27.220

or public health and safety so selling

0:37:24.040,0:37:28.990

action alcohol in an actual free market

0:37:27.220,0:37:32.020

isn't really a helpful discussion

0:37:28.990,0:37:35.860

because we don't have it and unlikely

0:37:32.020,0:37:39.720

that we ever will so what should we talk

0:37:35.860,0:37:39.720

about next slide

0:37:40.390,0:37:47.680

well our marketplaces are not free of

0:37:43.480,0:37:50.080

regulation they really do try to give

0:37:47.680,0:37:52.780

consumers some of the benefits of a

0:37:50.080,0:37:55.930

market economy one is which prices are

0:37:52.780,0:37:58.300

set by supply and demand where a for

0:37:55.930,0:38:01.060

example a new product hasn't have to

0:37:58.300,0:38:03.869

prove itself in the marketplace by

0:38:01.060,0:38:07.780

people buying it because they like it

0:38:03.869,0:38:11.080

not because there's been some deal that

0:38:07.780,0:38:12.730

makes it so cheap that people buy that

0:38:11.080,0:38:17.430

even though they would prefer to buy a

0:38:12.730,0:38:22.420

different product some a balanced

0:38:17.430,0:38:25.480

marketplace allows prices to be set by

0:38:22.420,0:38:28.480

supply and demand and that works its

0:38:25.480,0:38:31.750

magic and marketplace a second thing

0:38:28.480,0:38:36.369

that that our regulations probably do is

0:38:31.750,0:38:38.109

limit barriers to is to limit the

0:38:36.369,0:38:41.170

barriers to new businesses and new

0:38:38.109,0:38:44.710

products this issue ensures a wide

0:38:41.170,0:38:47.590

variety of products it allows large and

0:38:44.710,0:38:50.920

small companies to operate with a

0:38:47.590,0:38:55.359

reasonable profit in other countries

0:38:50.920,0:38:58.240

it's very common to allow exclude

0:38:55.359,0:39:01.410

exclusive arrangements for example in

0:38:58.240,0:39:06.010

Mexico up until a couple of years ago

0:39:01.410,0:39:10.330

all retailers bought they're from one of

0:39:06.010,0:39:12.580

two companies and they and the company

0:39:10.330,0:39:14.080

that they bought from it was an

0:39:12.580,0:39:17.470

exclusive arrangement they were

0:39:14.080,0:39:22.180

precluded from mine any other products

0:39:17.470,0:39:24.430

as one assault craft operators craft

0:39:22.180,0:39:28.060

beer companies just couldn't get their

0:39:24.430,0:39:30.390

product to market in Mexico and it

0:39:28.060,0:39:32.210

really couldn't get a foothold that

0:39:30.390,0:39:35.720

obviously hasn't have

0:39:32.210,0:39:39.410
in this country where we now about 4000

0:39:35.720,0:39:42.349
breweries and another 15 1600 in the

0:39:39.410,0:39:48.160
pipeline we have a flourishing craft

0:39:42.349,0:39:51.320
beer business we have a very vigorous

0:39:48.160,0:39:53.980
distilled spirits craft business and of

0:39:51.320,0:39:58.430
course the wine business has a lot of

0:39:53.980,0:40:00.380
large and small operators by limiting

0:39:58.430,0:40:04.760
the barriers such as exclusive

0:40:00.380,0:40:07.130
arrangements you allow a lot of products

0:40:04.760,0:40:09.830
they have a fair chance of making it in

0:40:07.130,0:40:13.970
the marketplace and it it provides

0:40:09.830,0:40:17.000
robust competition and a local market in

0:40:13.970,0:40:20.830
your community where there are a variety

0:40:17.000,0:40:23.690
of products new products in which local

0:40:20.830,0:40:28.849
commercial sector with profitable large

0:40:23.690,0:40:31.030
and small businesses ironically a free

0:40:28.849,0:40:35.150

market often requires government

0:40:31.030,0:40:38.540

intervention because companies sort of

0:40:35.150,0:40:41.660

naturally moved toward monopolies or

0:40:38.540,0:40:43.790

dominance of one or a large one or more

0:40:41.660,0:40:46.640

large companies you just need to go to

0:40:43.790,0:40:51.160

your commercial sector in your community

0:40:46.640,0:40:56.690

and see the dominance of large box words

0:40:51.160,0:40:59.930

in home improvement in other kinds of

0:40:56.690,0:41:04.700

business where are really only a couple

0:40:59.930,0:41:07.339

of very large companies and eventually

0:41:04.700,0:41:09.830

as it moves along customers and

0:41:07.339,0:41:13.970

consumers consumers lose the benefits of

0:41:09.830,0:41:16.640

a market economy markets generally don't

0:41:13.970,0:41:18.800

have a mechanism to prevent dangerous

0:41:16.640,0:41:23.780

products so that's a very critical

0:41:18.800,0:41:26.510

element of our regulations for these

0:41:23.780,0:41:30.230

reasons many countries have an antitrust

0:41:26.510,0:41:32.270

or competition cognition but can wade

0:41:30.230,0:41:38.599

into the marketplace when things get out

0:41:32.270,0:41:41.630

of balance and the US has both federal

0:41:38.599,0:41:44.480

and state antitrust laws and I trust my

0:41:41.630,0:41:51.870

although sometimes it

0:41:44.480,0:41:54.690

Asura blacks it's interesting to note

0:41:51.870,0:41:58.140

that hair trade practice regulations are

0:41:54.690,0:42:01.560

common legal concepts that prevent an

0:41:58.140,0:42:06.270

anti-competitive practices a lot of

0:42:01.560,0:42:09.120

times these laws are criticized for

0:42:06.270,0:42:12.330

being antiquated meant for another era

0:42:09.120,0:42:16.800

and yet we find the same concepts in

0:42:12.330,0:42:20.600

antitrust legislation it at the federal

0:42:16.800,0:42:23.460

level of the primary law keeping

0:42:20.600,0:42:27.230

businesses competitive is the Sherman

0:42:23.460,0:42:30.150

Antitrust law which has several business

0:42:27.230,0:42:33.570

practices which are considered to be

0:42:30.150,0:42:36.450

anti-competitive price discrimination

0:42:33.570,0:42:39.360

that tends to create a monopoly you may

0:42:36.450,0:42:43.860

remember we talked about our pricing

0:42:39.360,0:42:47.340

laws and it's same concept goes up

0:42:43.860,0:42:51.330

federal trust laws exclusive dealing

0:42:47.340,0:42:56.310

agreements tying arrangements these are

0:42:51.330,0:42:59.400

also business practices that have been

0:42:56.310,0:43:02.550

deemed anti-competitive by the Sherman

0:42:59.400,0:43:05.070

Antitrust law mergers and acquisitions

0:43:02.550,0:43:08.700

are what we usually think of when we

0:43:05.070,0:43:12.570

think of antitrust organizations but

0:43:08.700,0:43:16.230

they're only part of it so it's

0:43:12.570,0:43:19.530

important to make help people understand

0:43:16.230,0:43:27.200

that these are alcohol laws they are

0:43:19.530,0:43:30.780

very common in antitrust legislation an

0:43:27.200,0:43:33.210

arguably mean alcohol products have more

0:43:30.780,0:43:38.010

of a free market than other commodities

0:43:33.210,0:43:40.140

and you know that in most cut parts of

0:43:38.010,0:43:42.840

our country large national chains

0:43:40.140,0:43:46.110

dominate our local retail markets in

0:43:42.840,0:43:48.060

large grocery stores suppliers you look

0:43:46.110,0:43:50.130

not to pay a sliding fee to get their

0:43:48.060,0:43:52.890

product on the Shelf basically they're

0:43:50.130,0:43:56.040

flying your way into a market and if you

0:43:52.890,0:43:57.780

want a favorable slot which is usually

0:43:56.040,0:44:01.260

at eye level

0:43:57.780,0:44:05.220

on an end of an aisle you have to pay

0:44:01.260,0:44:07.860

extra for that product choices very

0:44:05.220,0:44:11.160

limited just go and look at the soda

0:44:07.860,0:44:15.360

aisle and you will find basically ten

0:44:11.160,0:44:17.430

Pepsi products apparently do you see

0:44:15.360,0:44:20.940

anything that's a local soft drink

0:44:17.430,0:44:24.920

company my question is are there even

0:44:20.940,0:44:27.510
any I couldn't name one if you ask me

0:44:24.920,0:44:31.530
some product choice is very limited

0:44:27.510,0:44:36.210
limited and the large chain can really

0:44:31.530,0:44:38.820
prevent in products coming up large

0:44:36.210,0:44:42.750
teams also can undercut your small

0:44:38.820,0:44:45.300
operators so small local businesses have

0:44:42.750,0:44:49.380
a very hard time competing with a large

0:44:45.300,0:44:54.660
enterprises trade practice was or

0:44:49.380,0:44:58.530
difficult to enforce and there are a

0:44:54.660,0:44:59.580
couple of reasons for that and so I want

0:44:58.530,0:45:03.570
to talk a little bit about an

0:44:59.580,0:45:05.550
enforcement a lot of times to find a

0:45:03.570,0:45:08.400
trade practice violation you have to

0:45:05.550,0:45:11.130
engage in complex financial analysis and

0:45:08.400,0:45:12.600
oftentimes your enforcement staff is not

0:45:11.130,0:45:17.040
trained to do that

0:45:12.600,0:45:19.320
so you may be a sort of a handicap you

0:45:17.040,0:45:22.140

may have a staff Shiraz when I was a

0:45:19.320,0:45:24.870

regulator I had one-half of one person

0:45:22.140,0:45:29.100

dedicated to trade practice regulations

0:45:24.870,0:45:32.520

so if we had a big case we would have

0:45:29.100,0:45:35.400

been very handicapped and trying to

0:45:32.520,0:45:38.130

handle that you have a lot of reluctant

0:45:35.400,0:45:39.810

complainants and witnesses I would get

0:45:38.130,0:45:41.550

complaints about trade practice

0:45:39.810,0:45:43.740

violations but the complainant

0:45:41.550,0:45:46.740

invariably would say you can never tell

0:45:43.740,0:45:50.700

where you've got this information so I

0:45:46.740,0:45:52.890

not only had someone who was reluctant

0:45:50.700,0:45:56.430

complain but would never serve as a

0:45:52.890,0:45:58.200

witness so it's very hard to make a case

0:45:56.430,0:46:00.270

and then of course you have a lot of

0:45:58.200,0:46:05.640

pressure to be quote business friendly

0:46:00.270,0:46:08.790

and I think that on that last point it's

0:46:05.640,0:46:10.810
really important to have fairness in our

0:46:08.790,0:46:13.620
marketplaces because

0:46:10.810,0:46:16.930
you don't want to give some advantage

0:46:13.620,0:46:19.600
marketplace advantage to a cheater what

0:46:16.930,0:46:20.890
about all those honest licensees then

0:46:19.600,0:46:23.380
play by the rules

0:46:20.890,0:46:25.720
day after day and yet get undercut on

0:46:23.380,0:46:29.290
price because they won't engage in

0:46:25.720,0:46:32.440
unfair trade practices so it's important

0:46:29.290,0:46:39.040
to understand why it's you know why you

0:46:32.440,0:46:40.840
do enforcement of these laws I would

0:46:39.040,0:46:44.040
suggest that you consider a

0:46:40.840,0:46:50.650
comprehensive enforcement program

0:46:44.040,0:46:56.380
obviously the the the cheapest in way of

0:46:50.650,0:46:58.630
enforcing laws is education it's true

0:46:56.380,0:47:02.320
that a lot of people in the industry

0:46:58.630,0:47:06.750

really are fully familiar with a lot of

0:47:02.320,0:47:09.940

these laws in Arizona there was a major

0:47:06.750,0:47:12.960

investigation with widespread practice

0:47:09.940,0:47:16.060

violations and they came to realize that

0:47:12.960,0:47:19.630

in many cases the retailer was

0:47:16.060,0:47:22.000

completely ignorant of trade practice

0:47:19.630,0:47:24.690

regulations and engaging in things that

0:47:22.000,0:47:27.700

they thought really were actually people

0:47:24.690,0:47:30.430

it's really important to educate you and

0:47:27.700,0:47:34.900

licensees in order to achieve voluntary

0:47:30.430,0:47:38.050

compliance and if you haven't done an

0:47:34.900,0:47:40.420

education effort for five years you

0:47:38.050,0:47:42.400

probably need to do one because in those

0:47:40.420,0:47:48.400

five years there's been major change

0:47:42.400,0:47:50.620

over again in companies and lots of lots

0:47:48.400,0:47:53.410

of other things you might want to

0:47:50.620,0:47:56.500

consider something like random audits or

0:47:53.410,0:48:00.160

being some capability to do what's

0:47:56.500,0:48:03.640

called forensic accounting so you have

0:48:00.160,0:48:08.080

people who can understand various

0:48:03.640,0:48:11.530

financial documents it's always helpful

0:48:08.080,0:48:13.240

when you do enforcement actions to

0:48:11.530,0:48:15.550

eventually publicize these things

0:48:13.240,0:48:18.910

because it does increase the deterrent

0:48:15.550,0:48:21.580

effect regular communication is really

0:48:18.910,0:48:25.630

important once you do some base

0:48:21.580,0:48:29.260

education following that up with some

0:48:25.630,0:48:33.340

kind of memo or information even

0:48:29.260,0:48:37.600

meetings semi-annually or quarterly it's

0:48:33.340,0:48:40.420

always a good idea because it keeps this

0:48:37.600,0:48:45.150

these issues up on the radar screen and

0:48:40.420,0:48:47.190

I think will help deterrence and

0:48:45.150,0:48:50.110

periodically it would be wise to

0:48:47.190,0:48:52.120

streamline and simplify your regulations

0:48:50.110,0:48:55.750

to enhance understanding and compliance

0:48:52.120,0:49:00.400

laws always get more complex as the

0:48:55.750,0:49:03.190

years pass and as legislators that

0:49:00.400,0:49:06.790

attempt to accommodate new ways of doing

0:49:03.190,0:49:09.190

things and period periodically you

0:49:06.790,0:49:11.980

really need to simplify these things so

0:49:09.190,0:49:16.540

that they're more effective so I would

0:49:11.980,0:49:18.970

recommend that also when you're when

0:49:16.540,0:49:23.200

you're doing an enforcement action or

0:49:18.970,0:49:25.510

responding to a complaint a couple of

0:49:23.200,0:49:29.620

things in your thought process might be

0:49:25.510,0:49:33.310

helpful one is what's the motivation is

0:49:29.620,0:49:36.880

somebody attempting to buy their way

0:49:33.310,0:49:40.150

into a marketplace they're just throwing

0:49:36.880,0:49:44.440

money or money around or are they trying

0:49:40.150,0:49:47.860

to engage in legitimate advertising and

0:49:44.440,0:49:51.970

promotion so it it's helpful to

0:49:47.860,0:49:55.150

understand the motivation in and then

0:49:51.970,0:49:58.240

look at if this is it really a

0:49:55.150,0:50:02.550

promotional event is it you know is it

0:49:58.240,0:50:02.550

within the boundaries of your laws

0:50:03.960,0:50:10.570

another thing is oftentimes the question

0:50:07.690,0:50:14.890

is given the supplier or distributor

0:50:10.570,0:50:18.250

provide things value and it's helpful to

0:50:14.890,0:50:20.310

look at to kind of categorize those

0:50:18.250,0:50:24.700

things there are some things where

0:50:20.310,0:50:28.860

they're just never legal if a supplier

0:50:24.700,0:50:33.530

is providing TV sets furniture hip cards

0:50:28.860,0:50:36.270

those just aren't ever legal and

0:50:33.530,0:50:38.820

you know so that you can focus on those

0:50:36.270,0:50:41.130

things that may or may not be legal

0:50:38.820,0:50:45.600

depending on whether they cross the

0:50:41.130,0:50:48.480

boundaries of say a monetary limit a lot

0:50:45.600,0:50:52.380
of times states will say you can provide

0:50:48.480,0:50:55.980
X number of signs one there are only

0:50:52.380,0:51:02.210
three or you can provide something that

0:50:55.980,0:51:04.740
doesn't see a monetary value of \$100 so

0:51:02.210,0:51:07.310
those kinds of things will make many

0:51:04.740,0:51:10.950
hopefully make your job a little easier

0:51:07.310,0:51:13.350
um it's important to look at third party

0:51:10.950,0:51:18.480
benefits such as advertising and

0:51:13.350,0:51:27.570
entertainment fire nationals and it's

0:51:18.480,0:51:31.110
really paying for now so it's important

0:51:27.570,0:51:33.420
to look at those things and again while

0:51:31.110,0:51:36.450
the investigation may be difficult and

0:51:33.420,0:51:37.710
tedious it's important for teachers is

0:51:36.450,0:51:40.530
because Cheers

0:51:37.710,0:51:44.070
hurt the good licensee who follows the

0:51:40.530,0:51:46.530
rules and it would be really sad seeing

0:51:44.070,0:51:52.110

Sunday's put licensees pulled out of

0:51:46.530,0:51:55.050

business because they refuse to cheat um

0:51:52.110,0:51:57.810

finally in conclusion our our fair trade

0:51:55.050,0:52:00.360

practice regulations are not antiquated

0:51:57.810,0:52:02.040

but they help maintain a balance

0:52:00.360,0:52:04.530

marketplace that provides a lot of

0:52:02.040,0:52:07.680

benefits for our consumers in our

0:52:04.530,0:52:10.200

businesses the u.s. does not have a

0:52:07.680,0:52:12.990

completely free market from any food or

0:52:10.200,0:52:15.060

drink products so these tournaments are

0:52:12.990,0:52:16.290

not really very helpful because they're

0:52:15.060,0:52:20.310

simply not relevant

0:52:16.290,0:52:22.860

um trade Kravis rate regulations can be

0:52:20.310,0:52:25.380

divided into five categories financial

0:52:22.860,0:52:27.990

ties exclusive contracts commercial

0:52:25.380,0:52:32.400

bribery consignment sales and pricing

0:52:27.990,0:52:37.530

practices and then exceptions lay out in

0:52:32.400,0:52:41.190
those categories reasonable retail trade

0:52:37.530,0:52:44.100
practice violations it autonomy almost

0:52:41.190,0:52:44.630
always involve social problems even in

0:52:44.100,0:52:48.329
US and

0:52:44.630,0:52:49.829
promise especially in areas that are

0:52:48.329,0:52:53.910
tainment districts but there are a lot

0:52:49.829,0:52:57.329
of bars and they're all doing trade

0:52:53.910,0:52:59.640
practice violations and again

0:52:57.329,0:53:02.279
well enforcement may be difficult a

0:52:59.640,0:53:04.799
multi-prong program using educational

0:53:02.279,0:53:08.309
communication on its investigation can

0:53:04.799,0:53:11.309
increase compliance and finally rules

0:53:08.309,0:53:13.499
are different in every state so industry

0:53:11.309,0:53:15.660
members must become knowledgeable about

0:53:13.499,0:53:17.759
the rules in which ever state they

0:53:15.660,0:53:21.319
operate and I'm going to give you some

0:53:17.759,0:53:25.619
resources where to find the rules

0:53:21.319,0:53:28.739
sometimes that's not easy but we have a

0:53:25.619,0:53:34.410
new resources resource that's designed

0:53:28.739,0:53:39.390
to help you out that resource is a

0:53:34.410,0:53:41.609
catalog of state regulations done in a

0:53:39.390,0:53:44.039
cooperative venture by the National

0:53:41.609,0:53:46.459
alcohol beverage control Association and

0:53:44.039,0:53:49.529
the National Conference of State liquor

0:53:46.459,0:53:53.249
administrators they work together and

0:53:49.529,0:53:57.029
developed a large questionnaire and have

0:53:53.249,0:54:00.839
cattle among all those statements that

0:53:57.029,0:54:03.929
responded and while it's a large

0:54:00.839,0:54:05.549
publication it's organized by state so

0:54:03.929,0:54:07.589
you can go to the state that you're

0:54:05.549,0:54:12.199
working in and then you can go to the

0:54:07.589,0:54:15.299
category and find out about their laws

0:54:12.199,0:54:17.609
some states do have comprehensive

0:54:15.299,0:54:19.219

information on trade practices and

0:54:17.609,0:54:21.689
they're in a booklet or on our website

0:54:19.219,0:54:23.309
so it should always check with your

0:54:21.689,0:54:27.390
State alcohol beverage control

0:54:23.309,0:54:30.689
organization and there are a few states

0:54:27.390,0:54:34.049
that do not have a statement alcohol

0:54:30.689,0:54:39.209
agency or a very small state alcohol

0:54:34.049,0:54:41.549
agency for example in Nevada there is no

0:54:39.209,0:54:44.009
state alcohol agency everything's done

0:54:41.549,0:54:46.499
at the local level except for trade

0:54:44.009,0:54:50.489
practices which are enforced by the

0:54:46.499,0:54:52.670
Nevada Attorney General's Office so it's

0:54:50.489,0:54:56.910
important fine you know who does what

0:54:52.670,0:54:59.120
then I would like to offer my website

0:54:56.910,0:55:02.550
all of my publications are they're

0:54:59.120,0:55:05.130
available for download and it's free I

0:55:02.550,0:55:09.660
have a new short report on fair trade

0:55:05.130,0:55:11.340
practice regulation and I have a monthly

0:55:09.660,0:55:13.830
newsletter you can sign up for that

0:55:11.340,0:55:17.100
again it's free I have educational

0:55:13.830,0:55:19.760
pieces PowerPoint presentations I also

0:55:17.100,0:55:23.580
have a publication called issue breeze I

0:55:19.760,0:55:27.840
published this every year for 2016 I

0:55:23.580,0:55:31.200
will revise it and it has these are a

0:55:27.840,0:55:35.010
collection of one or two pages on single

0:55:31.200,0:55:37.800
topics I have about 16 different topics

0:55:35.010,0:55:40.080
that I have simple explanations and

0:55:37.800,0:55:42.750
they're designed really for policy

0:55:40.080,0:55:46.040
makers and people that don't have a lot

0:55:42.750,0:55:49.740
of time to read anything extensively

0:55:46.040,0:55:53.550
also my legal expert reports are on my

0:55:49.740,0:55:56.280
website in the Maxwell pick pack vs.

0:55:53.550,0:55:58.620
Danner case it's a Kentucky case it has

0:55:56.280,0:56:00.900
a major discussion of why large grocery

0:55:58.620,0:56:03.680

chains want to sell all forms of alcohol

0:56:00.900,0:56:07.040

in their stores and lightly regulated

0:56:03.680,0:56:11.280

environments anyway that's free for

0:56:07.040,0:56:15.840

download on website and here are some

0:56:11.280,0:56:20.820

some websites that you can check and how

0:56:15.840,0:56:24.870

to go about checking them for your

0:56:20.820,0:56:28.100

information so I would be ready to take

0:56:24.870,0:56:30.540

questions ok Pam thank you very much for

0:56:28.100,0:56:33.990

your presentation we do have some

0:56:30.540,0:56:35.970

questions we are at almost the top of

0:56:33.990,0:56:38.910

the hour so hope folks can bear with us

0:56:35.970,0:56:41.400

for just a short while again handful of

0:56:38.910,0:56:43.920

questions for you Pam the first one is

0:56:41.400,0:56:48.680

can you clarify the limitations or

0:56:43.920,0:56:48.680

regulations applied to consignment sales

0:56:49.520,0:57:00.180

I'm not I'm not an expert in that area

0:56:54.710,0:57:04.080

basically it prohibits sales that are

0:57:00.180,0:57:06.990

really conditional one of the one of the

0:57:04.080,0:57:09.260

key elements to alcohol sales is they

0:57:06.990,0:57:12.230

have to be complete sales

0:57:09.260,0:57:14.360

and in many cases you know states that

0:57:12.230,0:57:17.720

have cash laws that you have to pay

0:57:14.360,0:57:21.380

immediately or within a few days and

0:57:17.720,0:57:25.160

that's designed to prevent some long

0:57:21.380,0:57:29.260

term relationship between a supplier and

0:57:25.160,0:57:33.530

a retailer consignment sales are are

0:57:29.260,0:57:36.140

basically incomplete sales where you can

0:57:33.530,0:57:41.200

return the product for example if it

0:57:36.140,0:57:44.240

doesn't sell and that kind of thing

0:57:41.200,0:57:47.000

okay next question

0:57:44.240,0:57:55.040

is private label a gray area for example

0:57:47.000,0:57:58.550

a retailer owning a label that is kind

0:57:55.040,0:58:00.890

of it may be a gray area it's a it's a

0:57:58.550,0:58:03.380

kind of unaddressed area I have a short

0:58:00.890,0:58:10.930

report on private labels and it's

0:58:03.380,0:58:16.750

available on my website in my opinion a

0:58:10.930,0:58:21.260

branded a branded private label product

0:58:16.750,0:58:28.490

from what I can tell is not legal but

0:58:21.260,0:58:33.520

I'm not a lawyer and I I don't I haven't

0:58:28.490,0:58:36.770

I've posed that question to the federal

0:58:33.520,0:58:39.530

alcohol authorities and I haven't got

0:58:36.770,0:58:44.380

any kind of answer so I don't really

0:58:39.530,0:58:47.330

know I I think that's an area where I

0:58:44.380,0:58:49.820

suggested that the offence issue in

0:58:47.330,0:58:53.330

advisory because there are some

0:58:49.820,0:58:56.420

situations where it it may or may not be

0:58:53.330,0:59:02.150

legal I don't think we know very much

0:58:56.420,0:59:05.030

about it okay and another question here

0:59:02.150,0:59:07.610

it says we are in the process of setting

0:59:05.030,0:59:11.150

up a comprehensive enforcement program

0:59:07.610,0:59:13.730

but need related referrals and resources

0:59:11.150,0:59:15.470

where can I find sample programs or

0:59:13.730,0:59:19.460

elements of programs for example

0:59:15.470,0:59:22.030

education audits communications etc etc

0:59:19.460,0:59:22.030

okay

0:59:22.720,0:59:33.410

the state of Arizona

0:59:26.620,0:59:36.350

you can talk to you know maybe Lee Hill

0:59:33.410,0:59:40.880

is their communication director and you

0:59:36.350,0:59:45.140

might start with her Craig Miller used

0:59:40.880,0:59:47.750

to and he probably he may still do I I'm

0:59:45.140,0:59:52.460

not really sure but he was in charge of

0:59:47.750,0:59:55.490

a long involved investigation of trade

0:59:52.460,0:59:57.590

practice violations and after they

0:59:55.490,1:00:01.130

reached a settlement agreement in an

0:59:57.590,1:00:03.500

issued fines they part of the settlement

1:00:01.130,1:00:07.640

agreement involved in education program

1:00:03.500,1:00:10.400

and a commitment to have your staff

1:00:07.640,1:00:14.060

attend some regular I think they were

1:00:10.400,1:00:17.780

quarterly meetings and so that's that's

1:00:14.060,1:00:21.200

a state where they really have attempted

1:00:17.780,1:00:25.270

to do more with enforcement and they

1:00:21.200,1:00:29.480

have a very small staff so you know

1:00:25.270,1:00:31.580

things like that can be done I know that

1:00:29.480,1:00:35.060

the state of Washington before they

1:00:31.580,1:00:39.170

privatized and deregulated had a large

1:00:35.060,1:00:40.880

trade practice staff and they still have

1:00:39.170,1:00:44.390

quite a few trade trade practice

1:00:40.880,1:00:47.360

regulations and so the washington liquor

1:00:44.390,1:00:53.090

and cannabis board might be a resource

1:00:47.360,1:00:56.540

for some expertise they're also in the

1:00:53.090,1:00:59.930

state of massachusetts they just would

1:00:56.540,1:01:02.480

actually in the middle of a significant

1:00:59.930,1:01:06.110

investigation and i think they would be

1:01:02.480,1:01:08.180

a good source of advice Ted Mahoney is

1:01:06.110,1:01:11.330

the person that was in charge of the

1:01:08.180,1:01:15.110

investigation and I would recommend him

1:01:11.330,1:01:18.680

to you okay

1:01:15.110,1:01:20.780

those are the questions we have we're

1:01:18.680,1:01:22.400

getting ready to wrap up there was a

1:01:20.780,1:01:25.250

final question on receiving the

1:01:22.400,1:01:28.160

PowerPoint if you had registered in

1:01:25.250,1:01:31.250

advance for this webinar the PowerPoint

1:01:28.160,1:01:32.960

was mailed to you if you registered at

1:01:31.250,1:01:34.850

the last minute I may have not had an

1:01:32.960,1:01:36.020

opportunity to get your name but we'll

1:01:34.850,1:01:39.770

send you

1:01:36.020,1:01:42.830

PowerPoint presentation afterward if you

1:01:39.770,1:01:46.370

would like it feel free also to email me

1:01:42.830,1:01:49.070

directly and I will send the PowerPoint

1:01:46.370,1:01:50.600

presentation to you so Pam thank you

1:01:49.070,1:01:52.550

very much for your time and for sharing

1:01:50.600,1:01:54.650

your valuable knowledge with us and

1:01:52.550,1:01:57.260

thank you all for joining napkin on this

1:01:54.650,1:01:59.120

webinar if anyone has questions that we

1:01:57.260,1:02:01.250

did not address or thinks of something

1:01:59.120,1:02:03.560

afterwards feel free to email me

1:02:01.250,1:02:05.830

you should have my email address Maggie

1:02:03.560,1:02:09.770

bar sheeny at nab co.org

1:02:05.830,1:02:13.880

also please feel very free to visit the

1:02:09.770,1:02:15.620

napkin website wwm core for various

1:02:13.880,1:02:18.800

resources including white papers

1:02:15.620,1:02:20.240

previous webinars and other materials we

1:02:18.800,1:02:21.920

would like your feedback about this

1:02:20.240,1:02:24.710

session and will soon be sending you a

1:02:21.920,1:02:27.080

quick survey to complete so if you have

1:02:24.710,1:02:29.570

any suggestions for future webinars feel

1:02:27.080,1:02:31.460

free to offer that to us as well it is

1:02:29.570,1:02:33.020

our goal to give you the education and

1:02:31.460,1:02:35.300

tools that you need to perform your

1:02:33.020,1:02:36.950

function effectively thank you all again

1:02:35.300,1:02:41.440

for participating in today's webinar

1:02:36.950,1:02:41.440

wishing everyone a great day goodbye