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## Notice of Permanent Rule Changes Related to Pull-Tab Inventory Control.

**This explanatory statement concerns the Washington State Gambling Commission's Amendment of WAC 230-14-260- Inventory Control.**

The Administrative Procedure Act ([RCW 34.05.325\(6\)](#)) requires agencies to complete a concise explanatory statement before filing amended rules with the Office of the Code Reviser. This statement must be provided to anyone who provided comments regarding the proposed rule-making.

Once persons who provided comments during this rulemaking have had an opportunity to receive this document, the Washington State Gambling Commission will file the adopted rule with the Office of the Code Reviser. These changes will become effective on or after February 11, 2023.

The Washington State Gambling Commission appreciates your involvement in the rule-making process. If you have any questions, please contact Jess Lohse, Acting Rules Coordinator, at [jess.lohse@wsgc.wa.gov](mailto:jess.lohse@wsgc.wa.gov) or (206) 786-3530.

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### **What are the agency's reasons for this rule change?**

The WSGC received a petition from a licensee proposing to amend rules so that pull-tab licensees no longer need to write the date they put a pull-tab game in play on purchase invoices. Some pull-tab licensees already write the date in play information on records besides the purchase invoices and feels there is duplication. The primary rule amendment will allow licensees flexibility related to pull-tab inventory control. The rule amendment will: 1) Allow pull-tab licensees to write the date they put a pull-tab game in play on the flare instead of a purchase invoice; and 2) Clarify what records pull-tab licensees must record I.D. stamp numbers on; and 3) Eliminate duplicative language related to distributors and invoice requirements; and 4) Amend language referring to I.D. stamps for consistency within the rule.

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**Summary of all public comments received on this rule proposal and consideration of the comments. If we responded to comments, add our response and how the final rule reflects consideration of the comments or why it fails to do so.**

At the August 2022 Commission Meeting, Taek Kim, the petitioner, provided comment to the Commissioners regarding the rule proposal. The petitioner noted that an amendment to the rule was needed because the requirement to write the date they place every pull-tab series in play on purchase invoices adds additional hardships for operators who do not use pull-tab point of sale/inventory systems. The petitioner noted that many operators already write the “date in play” information on the flare of the game or other separate tracking records after they place games in play. The petitioner noted that writing the date in play information also on the purchase invoices is duplication and not efficient. Furthermore, the petitioner noted that the date in play information written on purchase invoices does not add value to inventory control. The petitioner noted that amending the rule would be positive for pull-tab operators who do not use pull-tab point-of-sale/inventory systems because it will save them time from trying to find pull-tab games on purchase invoices to write the date in play.

Response: No response.

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**If there are variances from the proposed rule and final adopted rule, state the reasons for the differences (RCW 34.05.325(6)(a)(ii)).**

None.