

COMMENTS AND RESPONSES FOR PROPOSED REGULATIONS
MINIMUM INTERNAL CONTROL STANDARDS (MICS) FOR GAMBLING ESTABLISHMENTS:
GAMBLING FLOOR OPERATIONS AND PLAY OF CONTROLLED GAMES
CGCC-GCA-2011- -R

COMMENTS FROM WORKSHOP OF MARCH 29, 2011

The following oral comments/objections/recommendations were made regarding the proposed action at an informal workshop on March 29, 2011. The following also includes written comments, objections or recommendations received as part of this workshop.

1. Amendments to existing Section 12386(a)(6) would require that the *redemption* of chips occur only at a cage. The *sale* of chips would still be permitted at a cage or from a designated employee on the gambling floor.
 - a. Andy Schneiderman – Commerce Casino: For customer service purposes, it is a common practice to use chip runners to redeem chips, so that the players can stay at the table. Also, chip runners may have information that would be of value when detecting suspicious transactions, such as whether the transaction makes sense, given the stakes of the game being played. FinCEN regulations were recently changed, and they saw no need to require that chip redemptions occur only at the cage. There may also be a safety issue if customers were required to take large sums of chips across the gambling floor to the cage.
 - b. Keith Sharp – Hawaiian Gardens Casino & Normandy Casino: This regulation would require that customers take large sums of chips across the gambling floor, in full view of everyone, increasing the chance of a robbery inside the cardroom, or a follow-home robbery. The redemption of large sums of chips may be better handled in a more secure and private area.
 - c. Ileana Harris – Casino Club: Many small cardrooms have only one cage. During a shift change, while balancing the one drawer, the cage is closed. During this time, customers redeem chips at a podium, which is locked and under video surveillance. Under this regulation, I couldn't accommodate customers who want to cash-out and leave while the cage is closed.
 - d. Kyle Kirkland – Club One Casino: There are times when we operate only one cage. While the cage is closed during reconciliation, cashing-out would be moved to the podiums. These reconciliations can take as little as 15 minutes, or as much as 45 minutes if there's a discrepancy.

Cardrooms have many other responsibilities that can also cause these disruptions, such as shift changes, lunch breaks, and employees calling in sick. It becomes a real balancing act to comply with gaming regulations and all other state and federal laws.

e. Martin Horan – Bureau of Gambling Control (Bureau): If we allow these transactions to occur at a podium, then we will need to define a “satellite cage” or “podium,” require a certain level of security and surveillance, and limit podium access to chip runners only. We are not only concerned with the large cash transactions, but with such issues as robbery, loan sharking, embezzlement or skimming.

The regulations could take into consideration the concerns of the smaller Tier I and II cardrooms.

f. David Fried – Oaks Card Club: Players may need to cash-out when they change games. They use chip runners for these purposes.

g. Kermit Schultz – Lucky Derby Casino: For purposes such as customer service and staffing, the use of podiums is necessary at both large and small cardrooms.

h. Aaron Wong – Bureau: I have seen these podiums in the middle of the gambling floor, where customers can loiter, with the keys in the locks. In California Games, these podiums should be in the middle of the pit, surrounded by tables, where customers are not allowed.

Recommended Response (a – h): These comments were accepted in part and amendments to Section 12386(a)(6) deleted from these proposed regulations.

i. Deborah Dunn – Bureau: Section 12386(a)(6) should also be amended to prohibit *gambling businesses* from selling or redeeming player chips.

Recommended Response: This comment was rejected. Section 12386(a)(6) prohibits cardrooms from allowing *proposition player service providers* to sell or redeem chips because they operate under a contract with the cardroom. In contrast, *gambling businesses* do not operate under any control from the cardroom. Both gambling businesses and proposition player service providers are already prohibited from selling or redeeming chips.¹

2. Section 12391(a)(2) would require a cardroom to have policies and procedures that would prohibit its employees and key employees from playing any controlled game *during their work shift*, essentially prohibiting the use of house prop players. Section 12391(a)(3) would prohibit cardroom owners from playing any California Game on the premises of their own cardroom at *any time*. Section 12391(a)(4) would require cardrooms to have policies and procedures that would prohibit a licensee from *requiring* their employees to play controlled games on the premises of the cardroom where they are employed.

a. Joy Harn – The Bicycle Casino: House prop players have been used in our cardrooms for over 80 years. They start games and keep them going, allowing cardrooms to provide the games that people want to play. Our customers know that they are playing with owners or house prop players, and they look forward to it because the action is better. Prop players do

¹ California Code of Regulations, Title 4, Sections 12200.18, subsection (i), and 12220.18, subsection (i).

not have any advantage over other players. The Bureau has not provided any detail about complaints, if any, that have been received regarding the use of house prop players.

A survey in 2010 showed that there may be over 400 house prop players in use at California cardrooms. Prohibiting house prop players would not only result in the layoff of these 400 employees, but cause a negative ripple effect on other employees, as the number of games being offered declines.

b. Martin Horan – Bureau: There is no need to use house prop players in a California banking-type game. Prop players are not just being used to start games or keep them going. They are being used to fill tables. Also, we've been told that preferential treatment, such as shift assignments, is given to cardroom employees that agree to play as house prop players. The Bureau is open to allowing house prop players to play poker games only, with certain conditions. Further, the Bureau is fine with Section 12391(a)(3) that prohibits cardroom owners from playing California Games, as it protects the integrity of those games.

c. Kermit Schultz – Lucky Derby Casino: Allowing dishonesty or collusion through the use of house prop players would be the surest way to have your business close, as customers would not tolerate it. Players enjoy the social benefits of playing with the cardroom owner.

d. Dan Dreher – FLB Casino: We don't allow money to be given out to our employees with which to play games. We should not limit how much a house prop player can bet, or when they can play, as it would create an unfair advantage for other players. Our biggest concern is that this regulation will inhibit business and the play of the game. The Bureau should target problem cardrooms and not punish the entire industry with over regulation.

Owners should be allowed to play California Games. They are not playing against themselves. They are playing against a licensed proposition player. Owners are often expected to sit down and play California Games in an effort to teach others how to play. Further, there are already laws against cheating. We don't need regulations on top of regulations.

e. Keith Sharp – Hawaiian Gardens Casino & Normandy Casino: It's too much of a leap for the Bureau to prohibit house prop players just because they have received complaints from employees saying that they are being forced to play. The regulations already prohibit cardrooms from forcing their employees to play.

These conditions under which house prop players would operate should not force them to make certain decisions that affect the outcome of the game. If they did, the house would control the outcome of the game.

f. David Fried – Oaks Card Club: By limiting a cardroom's ability to get games started, this regulation adversely affects cardroom revenue at a time when revenues are already down 15%. The legislature has already addressed this issue of *who can play what* by prohibiting the house from occupying the player-dealer position in a California Game.

Why can't cardrooms have hybrid employees that are both dealers and house prop players? When it's slow, they can act as house prop players, and then deal at another table when business picks up. These hybrid employees would be subject to the same restrictions as regular house prop players.

The drop fees that are paid by house prop players are a necessary expenditure for their job, and they are reimbursed for that, as required by Labor Code section 2802.

g. Kyle Kirkland – Club One Casino: We use house prop players in poker games just like everyone else, to provide continuous service to our customers. On occasion, we use them in a California game just to show some activity at the table. We reimburse our house prop players for payment of the drop fee.

You should not set a minimum or maximum bet limit for house prop players, as it would create an unfair advantage for other players.

The Penal Code already makes cheating illegal, and we have terminated an employee for cheating within the past year.

h. Andy Schneiderman – Commerce Casino: House prop players are a fundamental part of the cardroom industry, and are compatible with local regulations. The City of Commerce allows the use of house prop players as long as they wear a badge and are limited to two per table.

Through internal policies, we believe that we have addressed the expense indemnification issue of Labor Code section 2802. House prop players sign an acknowledgement that they play with their own money, are responsible for their losses, get to keep their winnings, and that the house has no participation in the play of the game. House prop players are only reimbursed for the expense of paying the drop fee.

i. Keith Sharp – Hawaiian Gardens Casino & Normandy Casino: These regulations should be intelligently thought out and not damaging to our businesses.

j. Bill Williams – Office of the Attorney General: Even though there are other laws that prohibit cheating, these regulations can help prevent a lengthy Bureau investigation by prohibiting certain activities in the first place, such as prohibiting cardroom owners from playing California Games.

k. Paul Chilleo – Hollywood Park Casino: House prop players help keep our business operating. Without them, our employees would be out of work, and the City of Inglewood would have less revenue. This regulation could reduce our gambling operation by five tables.

l. Rodney Blonien – Blonien & Associates: House prop players have been used for 50 years or more. They help start games and keep them going when chairs are empty. This regulation could cause the unemployment of more than 100 house prop players that work in cardrooms.

Recommended Response (a – l): These comments were accepted in part. Industry representatives agreed to provide Commission staff with sample written language that would allow house prop players to play controlled games, with specified conditions. The sample language was received from the industry on April 26, 2011, and the regulations amended accordingly.

Section 12391(a)(2) was amended to permit house prop players to play controlled games, provided that they comply with a list of specified conditions. Section 12391(a)(3) was amended to permit owners and other employees to play controlled games, provided that they comply with the applicable game/house rules and the provisions of the Gambling Control Act (Act) and its regulations.

Other additional changes were made to these regulations to conform to the amendments noted above. Since house prop players would now be allowed to play controlled games, conforming amendments were no longer necessary to existing Section 12388(a). As a result, the amendments to Section 12388(a) were deleted from these proposed regulations. Section 12391(a)(4) prohibits employers from requiring their employees to play controlled games. Because the duties of a house prop player are to play controlled games, an exception for house prop players was added to Section 12391(a)(4).

3. Section 12391(a)(5) would require cardrooms to maintain specified information relating to gaming table operation. The following information must be maintained, by shift and by date:
 - (A) The tables that were open,
 - (B) The games that were played and collection rates,
 - (C) The total time that each table was in use, and
 - (D) The house dealers that were assigned to work.

a. Rodney Blonien – Blonien & Associates: This regulation would produce a tremendous burden on cardrooms, especially small cardrooms. The information that these forms would provide are available in other records which are already required to be kept by cardrooms.

Recommended Response: This comment was rejected. Section 12391(a)(5) has already been amended at the request of industry to insure that the information that is already maintained by cardrooms can be utilized to comply with this regulation. Paragraph (5) does not require that a special form be utilized, nor does it require that the information be maintained within a single file.

4. Section 12391(b) would require Tier III through V cardrooms to have at least one licensee or key employee on duty to supervise gambling operations during all hours the cardroom is open to the public. This regulation would also require one additional employee to be on duty for every 10 or fewer tables in operation to monitor gambling operations at those tables.
 - a. Kyle Kirkland – Club One Casino: The regulation requires one employee to monitor gambling operations for every 10 *or fewer* tables in operation. As a result, cardrooms would

be required to have additional staff on duty, especially during non-peak hours. With fewer than 10 tables in operation, the one key employee on duty should be all that is required.

Key employees may be supervisors who can hire and fire, but they are not necessarily the best person to adjudicate a poker dispute. Our floor persons are much more qualified to make decisions regarding house rules. Our floor persons don't supervise people, they supervise games. Perhaps the regulation should merely require that our floor persons be designated in some way and receive specified training.

b. Martin Horan – Bureau: The Bureau originally wanted the floor person to also be a key employee, because we see them serving in supervisory roles. The way this regulation reads, a cardroom could have 100 tables in operation and still get by with only one key employee to supervise the entire facility. The *one employee for every 10 tables* should be a key employee.

The Bureau would be agreeable to only one key employee, and no other floor person, when the tables in operation drop to 10 or less.

c. David Fried – Oaks Card Club: House dealers handle game disputes first, and then call over the floor person if needed to further quote or apply a house rule. The floor person is often used to calm the situation or take the heat off the dealer, since the dealer must continue to sit at the table with the other players.

The requirement that a floor person being added when the eleventh table opens could mean that an employee is called in the middle of the night, just to be sent home an hour later when the game at the eleventh table breaks.

These regulations should hold cardrooms to a qualitative standard, and leave staffing levels up to the business judgment of cardroom management. Regulatory systems usually don't dictate staffing levels.

d. Kermit Schultz – Lucky Derby Casino: The job duties of a floor person does not warrant them going through the extensive training that is provided to key employees. It would be a large burden to add an additional key employee when 10 tables increases to 11.

e. Bill Williams – Office of the Attorney General: The Bureau's position is primarily to insure that floor persons receive the same background check that key employees receive because floor persons insure compliance with the Act. In the process, cardrooms do not have to change the wages or internal designation of their floor persons.

f. Aaron Wong – Bureau: The way this section reads now, a cardroom could have 240 tables and still have only one key employee on duty to make all the decisions that may come up, which is highly improbable. When we ask dealers and chip runners who do they report to, they say the floor man on duty.

The main issue seems to be with the definition of a key employee in the Act, which is currently being considered for revision in AB1418.

g. Andy Schneiderman – Commerce Casino: We have 243 tables and have at least one shift manager (key employee) on duty at all times. We also have a slew of floor persons who apply defined standards or rules, but do not make discretionary decisions.

h. Dan Dreher – FLB Casino: It doesn't make sense to have a regulation that dictates staffing levels. Cardrooms already determine staffing levels based on what is necessary to make things function smoothly.

i. Joy Harn – The Bicycle Casino: Would it be better to wait for current legislation to complete which will redefine a key employee.

Recommended Response (a – i): These comments were accepted in part and the proposed regulation amended to delete the requirement that cardrooms have one employee on the floor for every 10 tables in operation. The requirement that at least one licensee or key employee be on duty at Tier III through V cardrooms would continue as written.

5. Section 12392(a)(3) would require cardrooms to have policies and procedures that discourage players from speaking, during the play of a hand, in a language that is not understood by all persons at the table.

a. Martin Horan – Bureau: Suggest that the language be amended to read: "...discourage players, during the play of a hand, from speaking in a language, *or using any other form of communication*, that is not understood by all persons at the gaming table, *to insure the fair and honest play of all games and gaming activity.*"

b. David Fried – Oaks Card Club: Although I don't have a specific recommendation today, I think that this regulation may need some revision to better align it with our English-only rule.

c. Kyle Kirkland – Club One Casino: We have 13 different languages spoken in our cardroom. For those that are involved in the play of a hand, it's English only, except for some special tables such as a Spanish table. An English-only rule could be a problem.

Recommended Response (a – c): These comments were accepted in part and Section 12392(a)(3) amended as suggested by the Bureau. The "*fair and honest play*" portion of the Bureau's suggestion is already stated in the introduction language, see subsection (a). As a result, paragraph (3) was amended to only include the "*other form of communication*" portion of the Bureau's suggested language.

CALIFORNIA GAMBLING CONTROL COMMISSION
MODIFIED TEXT OF PROPOSED REGULATIONS
MINIMUM INTERNAL CONTROL STANDARDS (MICS) FOR GAMBLING ESTABLISHMENTS:
GAMBLING FLOOR OPERATIONS AND HOUSE RULES.
CGCC-GCA-2011-___R

TITLE 4. BUSINESS REGULATIONS.
DIVISION 18. CALIFORNIA GAMBLING CONTROL COMMISSION.
CHAPTER 7. CONDITIONS OF OPERATION FOR GAMBLING ESTABLISHMENTS.

ARTICLE 1. GENERAL PROVISIONS.

§ 12360. Chapter Definitions.

Except as otherwise provided in Section 12002 of these regulations, the definitions in Business and Professions Code section 19805 govern the construction of this chapter. As used in this chapter:

(a) "Gaming activity" has the same meaning as defined in Title 11, CCR, Section 2010, subsection (f).

(b) "House rules" means a set of written policies and procedures, established by a gambling enterprise, which set general parameters under which that gambling enterprise operates the play of controlled games.

~~(a)~~(c) "Licensee" means "owner licensee" as defined in Business and Professions Code section 19805, subdivision ~~(ae)~~(ad).

~~(b)~~(d) "Security department," means the operational entity within a gambling establishment that is responsible, but not necessarily solely responsible, for patrol of the public areas of the establishment, and to assist in:

- (1) Maintaining order and security;
- (2) Excluding underage patrons;
- (3) Responding to incidents involving patrons or others;
- (4) Detecting, reporting and deterring suspected illegal activity; and
- (5) Completing incident reports.

~~(e)~~(e) "Surveillance unit," means the operational system or entity within a gambling establishment that is responsible for the video recording, as may be specified in Article 3 of this chapter, of all activities required to be under surveillance, monitored and/or recorded pursuant to

the Act and this division for the purposes of detecting, documenting and reporting suspected illegal activities, including suspected gambling by persons under 21 years of age, and assisting the personnel of the security department in the performance of their duties.

NOTE: Authority cited: Section 19811, 19824, 19840, 19841 and 19924, Business and Professions Code. Reference: Section 19805, 19841, 19860 and 19924, Business and Professions Code.

ARTICLE 3. MINIMUM INTERNAL CONTROL STANDARDS (MICS) FOR GAMBLING
ESTABLISHMENTS.

~~§ 12386. Cage Functions.~~

~~(a) The policies and procedures for all Tiers shall meet or exceed the following standards for the cage:~~

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~~(6) The purchase or redemption of chips by a patron may only occur at the cage or from a designated gambling establishment enterprise employee on the gambling floor. The redemption of chips by a patron shall only occur at a cage. Licensees shall not permit proposition player services providers to purchase or redeem chips for cash or cash equivalents from a patron or to sell chips to a patron. For the purposes of this article, the purchase or redemption of chips or the sale of chips shall not include the exchange of a chip or chips of one total value for a chip or chips of an equal total value.~~

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~~§ 12388. Extension of Credit, Check Cashing, and Automatic Teller Machines (ATMs).~~

~~(a) A licensee may extend credit to a patron if, prior to extending credit to the patron, the licensee determines that an extension of credit is not prohibited by any statute, law, regulation, or local ordinance. A licensee shall not extend credit to an owner, supervisor, player, or other employee of a gambling business (as defined in Title 4 CCR Section 12220) that is occupying a player-dealer position in any game in any gambling establishment owned by the licensee. A licensee shall not extend credit to an owner, supervisor, player, or other employee of a third-party provider of proposition player services (as defined in Title 4 CCR Section 12200) that is a party to a contract with the licensee to provide third party proposition player services in a game with a player-dealer position in any gambling establishment owned by the licensee. A licensee~~

~~may not extend credit to an any employee of the licensee to act as a “house prop player” or “public relations player” in for the purposes of playing any controlled game. In addition to complying with all laws regarding the issuance of credit, a licensee that extends credit to a patron shall address, in written policies and procedures and credit application form(s), the following requirements for the extension and collection of credit:~~

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§ 12391. Gambling Floor Operation.

(a) The policies and procedures for all Tiers shall meet or exceed the following standards for gambling floor operation:

(1) Except as provided in Business and Professions Code sections 19844, 19845, 19861 and 19921, all areas of the gambling establishment in which controlled games and gaming activity are being conducted shall be open to the public.

~~(2) A gambling enterprise employee or key employee shall not play, during his or her work shift, any controlled game on the premises of the gambling establishment for which he or she is employed.~~ When playing a controlled game on the premises of the gambling establishment for which he or she is employed, a “house prop player” or “public relations player” shall:

(A) Hold a valid work permit or key employee license, and prominently display on his or her person, the work permit or key employee badge issued by the Commission or a local jurisdiction;

(B) Comply with all house and game rules applicable to the game being played;

(C) Comply with all laws and regulations applicable to the play of controlled games;

(D) Not accept the deal in any controlled game with a rotating player-dealer position;

(E) Not use house funds to wager bets in the play of controlled games;

(F) Not be the house dealer for the game being played; and

(G) Leave the table when a waiting list exists for the game being played.

~~(3) A licensee shall not play any California Game on the premises of the gambling establishment for which he or she is licensed.~~ An owner of a gambling enterprise who chooses to play controlled games on the premises of his or her own gambling establishment, and any key employee or employee of a gambling enterprise, other than a “house prop player” or “public relations player,” who chooses to play controlled games on the premises of the gambling establishment for which he or she is employed, shall comply with all house and game rules

applicable to the game being played and all laws and regulations applicable to the play of controlled games.

(4) No licensee or employee of a gambling enterprise shall, as a consequence of an employee's refusal to play a controlled game, coerce, ~~threaten, intimidate, or take~~ take or threaten to take any action adversely affecting the terms and conditions of employment ~~of any employee of that gambling enterprise who does not, or chooses not to, play a controlled game on the premises of the gambling establishment,~~ for that employee. This paragraph does not apply to "house prop players" or "public relations players" whose duties include the play of controlled games. This paragraph does not create any new civil liability.

(5) A licensee shall, in written or electronic form, maintain the following information, by shift and by date:

(A) The gaming tables that were open;

(B) The controlled games that were played and the collection rate(s) at each open gaming table;

(C) The total amount of time that each gaming table was in use; and

(D) The names of the "house dealers" that were assigned to work the gaming tables.

(6) The information required by paragraph (5) shall be made available to the Bureau within two hours of the Bureau's request when the request is made during normal business hours. If the Bureau's request is made after normal business hours, the information shall be made available to the Bureau no later than two hours after the start of the next business day.

(7) A licensee shall not have in any room or combination of rooms where controlled games or gaming activities are being conducted, more gaming tables than the total number of tables the licensee is authorized to operate, unless all excess gaming tables are covered or prominently labeled as being non-operational and are under continuous recorded video surveillance, in accordance with paragraph (1), subsection (a) of Section 12396.

(8) The purchase or redemption of chips shall be transacted only by those designated gambling enterprise employees who have received the training required by section 103.64 of Title 31 of the Code of Federal Regulations. A licensee shall have policies and procedures in place to ensure compliance with Section 12404 of Article 4.

(9) Except as provided in Section 12388, a licensee shall not provide house funds to any person for the purposes of playing a controlled game, including but not limited to any of the following:

(A) Any person who holds a license associated with the gambling enterprise, issued pursuant to the Act or this division;

(B) Any employees of the gambling enterprise, whether on or off duty;

(C) Any patrons of the gambling establishment, except for the purposes of participating in an approved gaming activity;

(D) Any contract employees of the gambling enterprise, except payments made to a third-party provider of proposition player services in accordance with a Bureau-approved contract, pursuant to Section 12200.9; and

(E) Any business entity that sponsors any gaming activity or tournament operated by the licensee.

(b) In addition to the requirements of subsection (a), the policies and procedures for Tiers III through and including V shall include standards for gambling floor operations that provide for, Title 11, CCR, Section 2050 notwithstanding, at least one licensee or key employee to be on the premises at all times that the gambling establishment is open to the public to supervise the gambling operation and ensure immediate compliance with the Act and these regulations. ~~The policies and procedures for Tiers III through and including V shall also provide for at least one employee to be on the gambling floor for each shift, for every 10 gaming tables or fewer in operation, to monitor the gambling operation at those tables.~~

(c) Licensees shall establish and implement the applicable standards for gambling floor operations specified in subsections (a) and (b) no later than [the first day of the first full month six months following the effective date of this section].

NOTE: Authority cited: Sections 19801(l), 19811, 19826 (f), 19826(g), 19840, 19841, 19861, 19920 and 19984, Business and Professions Code. Reference: Sections 19801(a), 19801(g), 19801(h), 19801(j), 19801(l), 19805(c), 19823, 19826(g), 19841(b), 19841(d), 19841(g)(2), 19841(h), 19841(k), 19841(o), 19841(p), 19861, 19914(a)(2), 19920, 19924 and 19984, Business and Professions Code; Sections 330 and 330.11, Penal Code.

§ 12392. House Rules.

The policies and procedures for all Tiers shall meet or exceed the following standards for house rules:

(a) A licensee shall adopt and implement house rules, written, at a minimum, in English, which promote the fair and honest play of all controlled games and gaming activity, and which at a minimum:

(1) Allow for the operation of only those games that are permitted by local ordinance and state and federal laws and regulations;

(2) Address player conduct and etiquette and general rules so as to promote the orderly conduct and control of controlled games and gaming activities;

(3) Include provisions that discourage players ~~from speaking~~, during the play of a hand, ~~in a language from speaking in a language, or using any other form of communication~~, that is not understood by all persons at the gaming table;

(4) Shall be in addition to, and shall not conflict with, the game rules approved by the Bureau for each controlled game or gaming activity; and,

(5) Where applicable during the play of any controlled game or gaming activity, address the following:

(A) Customer conduct,

(B) Table policies,

(C) Betting and Raising,

(D) “Misdeals,”

(E) Irregularities,

(F) “The Buy-In,”

(G) “Tied Hands,”

(H) “The Showdown,”

(I) “House Way,”

(J) Player Seating and Seat Holding, and

(K) Patron Disputes.

(b) A licensee’s house rules must be readily available and provided upon request to patrons and the Bureau.

(c) Licensees shall establish and implement the applicable standards for house rules specified in subsections (a) and (b) no later than *[the first day of the first full month six months following the effective date of this section]*.

NOTE: Authority cited: Sections 19801(l), 19811, 19826 (f), 19826(g), 19840, 19841 and 19920, Business and Professions Code. Reference: Sections 19801(g), 19801(h), 19823, 19826(g), 19841(b), 19841(h), 19841(o), 19841(p) and 19920, Business and Professions Code.