

**GAMBLING CONTROL COMMISSION**

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August 3, 2023

To: All Cardrooms and Third-Party Providers of Proposition Player Services

Re: **Badge Mailing Policy**

The California Gambling Control Commission (Commission) continues to make strides in its strategic efforts to evaluate internal processes and procedures on an ongoing basis. Our values guide the work we do as an organization, as well as our interactions with our stakeholders. To ensure the Commission is employing efficient and cost effective practices, the Commission is re-evaluating and formalizing its badge mailing policy, as well as requesting industry feedback on potential modifications to the policy.

The Commission's badge mailing policy requires that temporary, initial, renewal, and replacement badges be sent by the United States Postal Service (USPS) to the licensee's employer's business address on file, or to the licensee's residence address if unemployed. In the past, Commission staff have accommodated individual requests for variations to the badge mailing policy, such as mailing badges to a location other than the employer's business address on file using the employer's FedEx account. The most prominent example is for Third-Party Providers of Proposition Player Services (TPPPS), wherein Designated Agents (DAs) have requested that badges be sent to the cardroom where licensees physically work rather than the employer's business address on file.

Moving forward, the Commission will no longer accommodate individual exceptions to the badge mailing policy and all badges will be sent to the employer's business address on file using USPS, or the licensee's residence address if unemployed. Additionally, replacement badges will not be issued absent submission of the required form (CGCC-CH2-01) and fee to the Bureau of Gambling Control. There are several reasons for discontinuing the practice of allowing for exceptions to the badge mailing policy, including:

- To avoid potential security and liability concerns relating to use of personal FedEx accounts.
- To establish a consistent policy wherein all industry members, have access to the same services at the same cost.
- To ensure that the application and badge replacement fee accurately capture all costs incurred.
- To reduce errors in issuance of badges to an incorrect address or point of contact.
- To ensure compliance with regulatory requirements, such as Title 4, CCR, sections 12090 and 12108, which requires submission of a Badge Replacement Request and fee prior to issuance.

However, we understand that for a TPPPS, it may be preferable to have badges sent directly to a designated cardroom where employees physically work. We also anticipate that some industry members would prefer the Commission use a FedEx service or a similar service that allows for tracking, even if the increase in costs result in a correlated application and badge replacement fee increase. Therefore, we are seeking industry feedback to assist with updating the Commission's badge mailing policy.

We ask that you provide feedback by completing the survey, using the applicable link below, no later than Friday, August 18, 2023.

[Cardroom Survey](#)

[TPPPS Survey](#)

For questions pertaining to this notice, please email Dolores Olivarez, Deputy Director of the Licensing Division at dolivarez@cgcc.ca.gov.

Thank you in advance for your survey participation and feedback.

Sincerely,

A handwritten signature in blue ink that reads "Stacey Luna Baxter". The signature is written in a cursive, flowing style.

STACEY LUNA BAXTER
Executive Director