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MINNESOTA RACING COMMISSION

November 30, 2018

Governor Mark Dayton
130 State Capital
75 Rev. Dr. Martin Luther King Jr. Blvd
St. Paul, MN 55155

Mr. Greg Hubinger, Director
Legislative Coordinating Commission
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100 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, Minnesota 55155-1206

Representative Sheldon Johnson
259 State Office Building
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Representative Laurie Halverson
100 Rev. Dr. Martin Luther King Jr. Blvd.
Saint Paul, Minnesota 55155

Representative Kurt Daudt
463 State Office Building
St. Paul, MN 55155

Ryan Inman, Revisor
Office of the Revisor of Statutes
700 State Office Building
100 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, Minnesota 55155-1206

Representative Linda Slocum
207 State Office Bldg.
100 Rev. Dr. Martin Luther King Jr. Blvd
St. Paul, MN 55115

Senator Mary Kiffmeyer
3103 Minnesota Senate Bldg.
St. Paul, MN 55155

Senator Jim Carlson
2207 Minnesota Senate Bldg.
St Paul, MN 55155

Via E-Mail

**Subject: Annual Report on Obsolete, Unnecessary or Duplicative Rules as Required by
Minnesota Statutes, Section 14.05, Subdivision 5**

Dear Governor Dayton, Senators, Representatives, Director Hubinger and Revisor Inman:

Minnesota Statutes, section 14.05, subdivision 5, directs the Minnesota Racing Commission (MRC) and other agencies to report to you by December 1 of each year whether any of its rules are obsolete, unnecessary, or duplicative of other state or federal statutes or rules.

Last year we reported on several rules we had identified as obsolete. As part of two separate rulemaking projects completed in 2018, we successfully repealed all of those rules.

This year we have identified the following additional obsolete rules:

- **Minn. R. 7877.0120, subp. 2.** This rule allows for license reciprocity with other racing jurisdictions. We have not implemented this provision for many years, if ever, because it is unworkable in practice.

- **Minn. R. 7877.0160, subp. 4.** This rule permits the MRC to renew an occupational license unless the licensee is determined to be ineligible. It is superfluous because all Class C licenses expire after one year and individuals must apply for a new license.
- **Minn. R. 7890.0100, subp. 15a.** This is a definition of “regulatory limit” that is no longer used. It is now superseded by the definition of “threshold” in Minn. R. 7890.0100, subp. 18a.

We are currently working to repeal each of these rules as part of a new rulemaking project. We published a Request for Comments on October 8, 2018, and the comment period closes on December 9, 2018. (Revisor's I.D. number 4568) This project will also update several other rules. We hope to adopt these revisions by the end of 2019.

If you have any questions about this letter or would like to discuss the Minnesota Racing Commission's rule making efforts, please contact me at (651) 925-3956.

Yours very truly,



Patricia M. Sifferle
General Counsel
Minnesota Racing Commission

c: Tom DiPasquale, Executive Director