



**american massage therapy association®**  
**nevada chapter**  
empowering Nevada massage therapists  
3683 Lucido Dr Unit 18, Las Vegas NV 89103

**www.amta-nv.org**  
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Karen Duddleston, Business License Division Manager  
City of Las Vegas  
333 N Rancho Drive  
Las Vegas NV 89106  
August 13, 2012

Re: TXT-44754 Proposed Privileged Licensing – Metro Suitability Amendment 6.52.020, of the Municipal Code of the City of Las Vegas, Nevada.

Dear Ms. Duddleston,

On behalf of the American Massage Therapy Association Nevada Chapter (AMTA-NV) I am again writing to thank you for your continued efforts to improve the massage therapy regulations in the City of Las Vegas and to ask for your consideration in altering TXT-44754 Proposed Privilege Licensing-Metro Suitability Amendment 6.52.020 of the Municipal code.

We understand there exists and have previewed the revised TXT-44754 that is to be presented on August 14, 2012, to the Planning Committee that will finally recommend a draft of the proposed code in a subsequent City Council meeting.

In the event it has still been a challenge to literally discern the intent of the definitions of who can perform medical massage therapy, as a modality of massage therapy as currently practiced by NVMTs or as a City of Las Vegas Business License definition or code related to the regulation of concurrently-state-licensed City business license holders in the same category (6.52), we have a suggested solution that may clear up the confusion and keep the intent of the purpose of the City's proposed definition of "medical massage therapy":

From "**Ancillary medical massage therapy**" to "**Ancillary medical *ly-related* massage therapy**"

From "**Medical massage therapy**" to "**Medical *ly-related* massage therapy**"

Any type of massage therapy, for which an NVMT is qualified, is able to be physically applied – the confusion arises when the licensed, qualified professional by which state law includes them, are not included in a local jurisdictional definition. In this vein of argument, we might additionally suggest alternately-adding:

**"Medical massage therapy" means the physical application of massage therapy by a licensed medical professional at such professional's licensed place of business and by a massage therapist which is licensed by the City and State.**

If neither of the above work for the purposes of allowing a medical massage therapy definition to be used exclusively for the exemption of a Licensed Medical Professional from massage establishment business license, then may we suggest adding:

**"Ancillary medical massage therapy", for the purpose of this massage establishment business license exemption, means the provision of massage therapy by a massage therapist which is licensed by the City and State, limited to one room dedicated to massage therapy no larger than one hundred-fifty square feet, which is incidental to the primary medical services provided by a licensed medical professional at such professional's licensed place of business**



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**“Medical massage therapy”**, *for the purpose of this massage establishment business license exemption*, **means the physical application of massage therapy by a licensed medical professional at such professional’s licensed place of business.**

Thank you for your time and consideration. If I can provide any additional information, please feel free to contact me.

Respectfully,

David Otto, Chapter President, AMTA-Nevada Chapter  
AMTA-Nevada Government Relations Committee  
(702) 706-6774

CC: Lisa Cooper, Executive Director, Nevada State Board of Massage Therapists