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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Paul Resch, Secretary  
**Pennsylvania Gaming Control Board**  
P.O. Box 69060  
Harrisburg, PA 17106-9060  
Attention: Public Comment on Regulation #125-64

Re: *IGT Comments regarding 58 PA Code Chapter 429a relating to manufacturer designees*

Dear Mr. Resch:

On behalf of International Game Technology ("IGT") and its subsidiaries, we would like to thank the Pennsylvania Gaming Control Board (the "Board") for the opportunity to comment on the proposed rules and respectfully request the Board take into account the following suggestions.

IGT has one observation regarding Chapter 429a (relating to manufacturer designees) created by the Act of November 1, 2006 (P.L. 1243, No 135). The term of "manufacturer designee" was never defined in the *Act* under section 1317.1 manufacturer licenses. In section 1317.1(d.1)(1) of the *Act* it states that 'A licensed manufacturer *or its designee*, as licensed by the board, may supply or repair any slot machine or associated equipment manufacturer by the licensed manufacturer.' The term "manufacturer designee" is not clearly defined in this section. In section 1103 under definitions of the *Act* the phrase is not listed as a defined term either. IGT recognizes the statute cannot be changed to define the term at this time; however IGT respectfully recommends this term be defined clearly in Chapter 429a and in Chapter 401 under definitions.

Thank you for your consideration in this matter. Should you have any questions, please feel free to contact me at (702) 896-8597.

Sincerely,

Gayle Bauer  
Regulatory Compliance Manager

GB:PAB:pab

**International Game Technology**

**Regulatory Compliance**

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