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INDEPENDENT REGULATORY
REVIEW COMMISSION

Daniel S. Ojserkis, Esq.
Office Managing Partner

February 13, 2008

VIA EMAIL & REGULAR MAIL

Richard Sandusky
Director of Regulatory Review
Pennsylvania Gaming Control Board
303 Walnut Street
P. O. Box 69060
5th Floor, Strawberry Square
Harrisburg, PA 17101

Re: Comments to Proposed Regulations 58 Pa.C.S. § 461a, et. seq.

Dear Mr. Sandusky :

Washington Trotting Association, Inc. ("WTA") respectfully requests the Pennsylvania Gaming Control Board (the "Board") to consider the following comments to proposed regulations 58 Pa.C.S. § 461a, et. seq. :

• **Section 461a.8(b)**

Proposed regulation 58 Pa.C.S. § 461a.8(b) removes the requirement that gaming vouchers expire.

WTA respectfully submits that a transition period should be provided for in the regulation to permit the licensee to utilize its current ticket inventory and to redeem the vouchers currently in circulation with an expiration date. WTA suggests a six month transition period.

• **Sections 461a.1(d)(9)**

Proposed regulation 58 Pa.C.S. § 461a.1(d)(9) requires slot machine licensees to establish "[p]rocedures for the payment of the value of unredeemed gaming vouchers to patrons whose identity can be determined by the slot machine licensee."



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WTA respectfully suggests that the Board implement a minimum threshold amount that would apply to the requirement that procedures be established to identify the owner of an unredeemed voucher. Numerous unredeemed vouchers with values beginning at \$0.01 are found on the gaming floor. Trying to determine the owner of such vouchers would be overly burdensome on the licensee. WTA suggests that the Board set a threshold amount of \$25.00 per voucher to research found unredeemed vouchers.

- **Sections 461a.1(d)(10) – (11)**

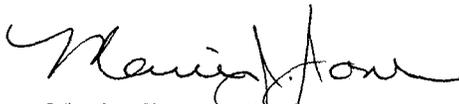
Proposed regulation 58 Pa.C.S. 461a.1(d)(10) requires slot machine licensees to establish “[p]rocedures for the retention, tracking and payment of the value of unredeemed gaming vouchers to the State Treasurer as required under Article XIII.I of the Fiscal Code (72 P.S. §§ 1301.1-1301.28a) regarding the disposition of abandoned and unclaimed property.”

Proposed regulation 58 Pa.C.S. § 461a.1(d)(11) requires slot machine licensees to establish “[p]rocedures for filing with the Board a copy of any report submitted to the State Treasurer as required by Article XIII.I of the Fiscal Code.”

WTA requests clarification regarding the requirements the Board will impose under these regulations. WTA suggests that, if that the Board will require specific procedures, that those parameters or specifications be delineated in the proposed regulations

Thank you for considering the comments of WTA to the proposed regulations.

Respectfully submitted,


Marie Jiacobello Jones

cc: ✓ Arthur Cocodrilli, Chairman, Independent Regulatory Review Commission