

#2677



Philadelphia Park
CASINO

RECEIVED

APR 14 2008

5

April 14, 2008

By Hand

Paul Resch, Secretary
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060
Attn: Public Comment on Regulation No. 125-79

Re: Comments to Proposed Regulations 58 Pa.C.S. §§ 465a

INDEPENDENT REGULATORY
REVIEW COMMISSION

2008 APR 18 AM 9:41

RECEIVED

Dear Mr. Resch:

Thank you for the opportunity to clarify previously filed comments to the above referenced proposed regulations. Greenwood Gaming and Entertainment, Inc. ("GGE") respectfully requests the Pennsylvania Gaming Control Board (the "Board") to consider the following:

Section 465a.26 Jackpot Payouts.

The proposed regulations should allow for flexibility in the way GGE assigns duties and responsibilities to various staff and departments. For instance, the proposed regulations refer to "lead" slot attendants. GGE does not designate "lead" slot attendants and this a position not currently in our jobs compendium. GGE sees no valid regulatory reason why these duties cannot be performed by slot attendants. Similarly, functions designated to be performed by a specific position should include the designation "or above" to allow those personnel who supervise or manage departments to perform the designated duties.

The purpose of a two-part manual Jackpot Receipt is unclear and the form currently utilized by GGE will not comply with the proposed regulations. GGE would prefer to use its existing Request for Jackpot Slip in its current form. An additional concern with the two part form is that it may cause confusion in paying out jackpots and hand pays (i.e. copy could be given to another patron to attempt to be paid again, patron could claim they were never paid, etc.) GGE would also like to add language that would permit the use of a code corresponding to a winning combination as an alternative to noting the winning combination of characters.

As is referenced as a general statement above, proposed Section 465a.26(c)(3) should not limit the ability of GGE to use slot attendants to pay jackpots up to \$9,999.99 since

they are trained on all of the proper policies and procedures to pay jackpots up to this amount.

Please confirm that proposed Section 465a.26(c)(7) refers to unclaimed jackpots.

Proposed Section 465a.26(c)(9)(ii) requires a signature by the patron. GGE requests that this requirement be removed because the electronically generated jackpot slips and ACSC act as a verifier. Additionally, the replenishment of the pouch to balance acts as another check. Requirement of a signature simply adds more time to the transaction without attendant benefit.

Proposed Section 465a.26(c)(11)(i) should be the final step in the process, not the first. Having a verifier both prior to the jackpot being processed and at the time of payment is redundant.

Proposed Section 465a.26(c)(15) should include a requirement that when the slot computer system is offline or an electronic jackpot payout slip cannot be created, a three-part manual jackpot payout slip shall be utilized. The book or machine (WIZ) used shall contain pre-printed, serial numbered three-part manual jackpot payout slips that include all of the information that is required on the electronic jackpot payout slip in accordance with proposed Section 465a(c)(8).

Proposed Section 465a.26(c)(16) should include a requirement that the unused manual jackpot payout books or excess forms for the machine (WIZ) be secured in a locked cabinet, with the control to this cabinet maintained by accounting.

Proposed Section 465a.26(17) should include the same requirements as noted for proposed Section 465a.26(15). Additionally, a slot machine licensee shall maintain a manual jackpot payout slip log for each gaming day or portion thereof that the slot computer system is offline.

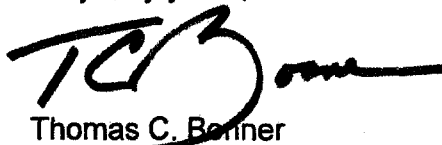
Proposed Section 465a.26(18)(i) should provide that the manual jackpot request will be given to the cage cashier, along with the original manual jackpot slip in order to obtain the fund to pay the jackpot.

Proposed Section 465a.26(18)(iii) should provide that at the end of the gaming day, the accounting department will unlock the third copy from the Wiz Machine and marry the original from the Cage Cashier and the duplicate from the accounting drop box when a Wiz machine is utilized. If a manual jackpot payout book is utilized, the third copy shall be maintained in the book with the book to be turned into the slot shift manager for completion.

GGE requests that proposed Section 465a.26(c)(19) be clarified so that it is clear these are applicable only when a manual jackpot payout book log is utilized and are not applicable when the WIZ machine is utilized.

Some additional comments to the proposed regulation have been included in "blackline" form attached to this letter. We urge you to incorporate these comments in a revised regulation proposal. We will be happy to answer any questions you may have on these comments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'TCB Bonner', with a long horizontal flourish extending to the right.

Thomas C. Bonner
Vice President and General Counsel

(c) The internal control procedures developed and implemented by the slot machine licensee under subsection (a) must, at a minimum, include:

(1) The use of a two-part manual jackpot payout receipt and a two-part electronically generated jackpot payout slip created by a slot attendant or slot supervisor, evidencing the observation by the slot attendant or slot supervisor of the winning combination of characters or a code corresponding to the winning combination of characters on the slot machine and a determination as to the appropriate amount of the jackpot payout based on the observed winning combinations.

(2) A requirement that the electronically generated jackpot payout slip not be susceptible to any changes or deletion from the slot computer system by any personnel after preparation.

(3) A requirement that if the jackpot range is \$1,200 to \$9,999.99, the witness on the two-part manual jackpot payout receipt and the two-part electronically generated jackpot payout slip be a lead slot attendant or above.

(4) A requirement that if the jackpot is between \$10,000 or more but less than \$25,000, the witness on the two-part manual jackpot payout receipt and the two-part electronically generated jackpot payout slip be a slot supervisor or above.

(5) A requirement that if the jackpot amount is \$25,000 or more, a slot shift manager or above shall sign the manual jackpot payout receipt attesting that the winning combination of characters or a code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the two-part manual jackpot payout receipt. The two-part manual jackpot payout receipt shall then be immediately returned to the preparer.

(6) A requirement that if the amount is \$1,200 or more the slot attendant shall immediately transport the original of the manual jackpot payout receipt and the original of the electronically generated jackpot payout slip to the cashiers' cage.

(7) A requirement that the following information be on the two-part manual jackpot payout receipt:

- (i) The date and time of the jackpot.
- (ii) The asset number of the slot machine on which the jackpot was registered.
- (iii) The winning combination of characters constituting the jackpot or a code corresponding to the winning combination of characters constituting the jackpot.
- (iv) The amount of the jackpot payout.
- (v) The method of payment requested by the patron (cash or slot licensee check).

(vi) The signature or identification code of the preparer.

(vii) If the slot machine or the progressive meter is reset prior to the patron being paid or if payment is made directly to the patron by a slot attendant, the following additional signatures or identification codes:

(A) The signature or identification code of a security department member or slot operations department member other than the preparer attesting to the winning combination of characters or a code corresponding to the winning combination of characters constituting the jackpot and the amount of the jackpot payout when the amount is below \$1,200.

(B) The signature or identification code of a lead slot attendant or above attesting to the winning combination of characters or a code corresponding to the winning combination of characters constituting the jackpot and the amount of the jackpot payout when the jackpot amount is between \$1200 and \$9,999.99.

(C) The signature or identification code of a slot shift supervisor or above attesting to the winning combination of characters or a code corresponding to the winning combination of characters constituting the jackpot and the amount of the jackpot payout when the jackpot amount is \$10,000 or more but less than \$25,000.

(D) The signature or identification code of a slot shift manager or above attesting to the winning combination of characters or a code corresponding to the winning combination of characters constituting the jackpot and the amount of the jackpot payout when the jackpot amount is \$25,000 or more.

(8) A requirement that the following information be on all two-part electronically generated jackpot payout slips:

(i) The date on which the jackpot occurred.

(ii) The asset number of the slot machine on which the jackpot was registered.

(iii) The winning combination of characters constituting the jackpot or a code corresponding to the winning combination of characters constituting the jackpot.

(iv) The type of win (that is, Progressive or Jackpot).

(v) The amount that is to be paid to the winning patron. This amount may, at the slot machine licensee's discretion, be rounded up to the nearest whole dollar.

(vi) A unique number generated by the slot computer system.

(vii) The signature or identification code of the preparer.

(viii) The signature or identification code of the witness on the duplicate copy only.

(ix) The signature or identification code of the cashier providing the funds to the preparer.

(9) A requirement that whenever a winning patron is paid directly by a slot attendant's imprest fund the following procedures be followed:

(i) A two-part electronic jackpot payout slip is generated and a two-part manual jackpot payout receipt is completed in accordance with paragraph (1).

(ii) Before payment is made to the winning patron, the jackpot payout receipt shall be signed by the patron in the presence of the slot attendant and a witness.

(iii) After the slot attendant determines that the required signatures verifying the winning combination of characters or a code corresponding to the winning combination of characters on the slot machine and the amount to be paid have been placed on the manual jackpot payout receipt, the slot attendant shall pay the winning patron in the presence of ~~the~~ the security department member or a verifying slot attendant other than the preparer witness.

(vi) Once payment has been made and all required signatures obtained, the slot operations department member or security department member witnessing the payment shall obtain the duplicate copy of the manual jackpot payout receipt and immediately deposit it into a locked accounting box.

(vii) The slot attendant shall ~~attach~~ present the original jackpot payout receipt to the cashier cage original electronically generated jackpot payout slip and forward both forms, by the end of the slot attendant's shift, to the cashiers' cage for reimbursement. The cashier shall attach the original jackpot receipt to the original electronically generated jackpot slip. The duplicate of the electronically generated jackpot payout slip should be deposited by the slot attendant into a locked accounting box immediately after obtaining the funds from the cashier's cage.

(10) When jackpot payouts are made from slot attendants' imprest funds, create procedures for the replenishment of the imprest funds and the reconciliation process to be used by the slot attendants when jackpot payouts are made from slot attendants' imprest funds.

(11) A requirement that the two-part manual jackpot payout receipt and the two-part electronically generated jackpot payout slip be distributed as follows:

(i) Both the original and duplicate of the jackpot payout receipt shall be handed to the witnessing slot operations department member or security department member by the preparer for verification and signature.

(ii) The duplicate of the manual jackpot payout receipt shall be presented to the winning patron who shall be required to present the duplicate to the witness before being paid the jackpot.

(iii) The original of the manual jackpot payout receipt shall be attached to the original electronically generated jackpot payout slip and forwarded to the cashiers' cage for payment of the funds.

(iv) The duplicate of the manual jackpot payout receipt shall be placed into a secured lock box for slot accounting by the witness.

(v) The duplicate of the electronically generated jackpot payout slip shall be placed inside a secured lock box for slot accounting by the generating slot attendant.

(12) A requirement that the slot machine licensee's accounting department perform, at the conclusion of each gaming day, effective audit procedures over the issuance of jackpot payouts including adequate comparisons to gaming voucher system data.

(13) Detailed procedures on the processing of all system overrides or adjustments in regards to jackpot payouts.

(14) A requirement that any person that witnesses a jackpot payout may not be permitted to override the jackpot payout.

(15) A requirement that when the slot computer system is offline or an electronic jackpot payout slip can not be created, a three-part manual jackpot payout book shall be utilized. The three-part manual jackpot payout book shall contain preprinted, serial numbered three-part manual jackpot payout slips that include all of the information that is required on the two-part manual jackpot payout receipt in accordance with paragraph (7).

(16) A requirement that unused manual jackpot payout books be maintained in a secured locked cabinet, that the key to the cabinet be controlled by the security department and that the manual jackpot payout books can only be signed out by the slot shift manager when the slot computer system is offline.

(17) A requirement that a slot machine licensee maintain a manual jackpot payout book log for each gaming day or portion thereof that the slot computer system is offline that includes the following information:

(i) The slot machine licensee's name pre-printed on the top of the log.

(ii) The gaming day.

(iii) The signature and identification code of the slot attendant assigned the three-part manual jackpot payout book.

(iv) The date and time of issuance of the three-part manual jackpot payout book.

(v) The series of numbers preprinted on the three-part manual jackpot payout book.

(vi) The signature and identification code of the slot shift manager issuing the manual jackpot payout book.

(vii) The date and time the three-part manual jackpot payout book is returned.

(viii) The series of numbers preprinted on the three-part manual jackpot payout book that were completed by the slot attendant.

(ix) The signature and identification code of the slot shift manager receiving the returned manual jackpot payout book.

(18) A requirement that the three-part manual jackpot payout slips be distributed as follows:

(i) The original shall be given to the cashiers' cage to obtain the funds to pay the jackpot to the winning patron or to replenish the imprest funds of the slot attendant that paid the winning patron.

(ii) The second copy shall be retained by the security department member or slot operations department member other than the preparer and shall be immediately transported to the locked accounting box witness of the payout. The witness shall immediately transport the second copy to a locked accounting box.

(iii) The third copy shall be maintained in the manual jackpot payout book. At the end of the slot attendant shift the manual jackpot payout book shall be turned into the slot shift manager and the manual jackpot payout book log shall be completed.

(19) A requirement that the original manual jackpot payout book log be forwarded to the accounting department at the end of the gaming day and that the slot operations department retain a copy of the manual jackpot payout book log.

(20) A requirement that the manual jackpot payout books turned into the slot shift manager at the end of each slot attendant's shift be forwarded to the accounting department; that the accounting department ensure that all three copies of the manual jackpot payout slips contain the same information; and that any discrepancies between the three copies are researched and documented.

(21) A requirement that the manual jackpot payout books are audited by Accounting to the manual jackpot payout book log and that any discrepancies between the manual jackpot payout books and the manual jackpot payout book log are researched, ~~and documented~~ and reported.

(22) A requirement that the surveillance department is notified of all jackpot payouts when the amount of the jackpot payout is \$10,200 or more. The surveillance department shall log all calls regarding jackpot payouts in the surveillance log.