



# PhiladelphiaPark

CASINO

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February 23, 2009

**VIA FEDERAL EXPRESS**

Richard Sandusky  
Director of Regulatory Review  
Pennsylvania Gaming Control Board  
303 Walnut Street  
P.O. Box 69060  
Harrisburg, PA 17106-9060

Attn: Public Comment on Rulemaking #125-94

**RE: Comments to Proposed Rulemaking #125-94**

Dear Mr. Sandusky:

Greenwood Gaming and Entertainment, Inc. ("GGE") is the holder of a Category 1 slot machine license which authorizes GGE to operate Philadelphia Park Casino & Racetrack ("PPC") in Bensalem, Pennsylvania. GGE respectfully submits the following comments to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's proposed rulemaking, as captioned above, which was published in the *Pennsylvania Bulletin* at 39 Pa.B. 423, on January 24, 2009.

The proposed rulemaking at issue focuses on the Slot Machine Master List ("Master List"). The rulemaking proposes splitting the current Master List into multiple lists and renaming each list. The proposed revision also modifies the required information for each slot machine list. Although GGE does not object to any of the proposed revisions to the Board's regulations, GGE seeks confirmation regarding certain operational matters in connection with the Bureau of Gaming Laboratory Operations ("Gaming Lab").

GGE's slot operations personnel have engaged in multiple discussions with the Gaming Lab regarding these proposed revisions. The Gaming Lab has acknowledged during the course of these discussions that it will modify its Unified Masterlist to match the form of the proposed regulation if this rulemaking is adopted. In addition, the Gaming Lab has agreed to allow GGE to modify the Gaming Lab's Slot Machine Modification Request ("SMMR") form to satisfy the requirements of the Slot Machine Movement Log ("MML"). GGE will add the following items to the Gaming Lab's SMMR: (i) a model column, (ii) the time for the date of conversation, (iii) the date and time of G-TECH notification and (iv) two (2) signature lines for slot operations department technical signatures. As a result of these modifications, the SMMR would satisfy the requirements of the MML as noted in proposed regulation 58 Pa. Code 463a.5(e)-(f). This would eliminate the need to have two (2) separate documents with nearly identical information.

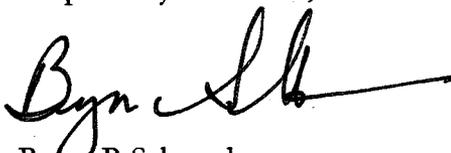
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GGE identified the preceding operational matters to ensure that its understanding of the proposed regulation and the effects of implementation are accurate. Accordingly, GGE respectfully requests that the Board confirm the Gaming Lab's position regarding the preceding revisions to its operational documents.

Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bryan P. Schroeder", with a long horizontal flourish extending to the right.

Bryan P. Schroeder  
Assistant General Counsel  
Greenwood Gaming & Entertainment, Inc.

bps

cc: Arthur Cocodrilli, Independent Regulatory Review Commission (via Federal Express)