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File No. 44337-00047

February 7, 2011

Via Email & Regular Mail

Susan A. Yocum
Assistant Chief Counsel
Pennsylvania Gaming Control Board
P. O. Box 69060
303 Walnut Street
Harrisburg, PA 17106

Re: Shuffle Master, Inc. – Comments to Proposed Rulemaking Table Game Equipment

Dear Ms. Yocum:

As you know, I represent Shuffle Master, Inc. ("SMI"), a manufacturer licensee. On behalf of SMI, I am submitting the following comments to the proposed rulemaking changing the temporary Table Game Equipment regulations to permanent regulations.

Specifically, SMI's comments on section 603a.17- 3(d)(1)&(2) provides that a dealing shoe used in Minibaccarat, Midibaccarat and Baccarat must have a removal lid that is opaque from the point where it meets the face plate to the point at least four inches from the face plate and the sides and back above the base plate must also be opaque. This regulation does not delineate between a manual dealing shoe that should have these requirements and an automatic dealing shoe. These requirements should not apply to an automatic dealing shoe as it would expose the wiring and hardware components of same. SMI recommends that this provision be amended to indicate manual shoes or an exemption for automatic dealing shoes.

SMI also has comments to section 603a.17-3(h), which provides that an automated shuffling device may not provide any information that can be used to aid in projecting the outcome of the game, tracking of the cards played and cards remaining to be played, analyzing the proper probability of a game, or analyzing the strategy for playing or betting



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Page 2

to be used in a game. SMI currently has utility products, which track the cards of the game but for no advantage, nor for use in determining the outcome of the game, strategy for betting to be used or remaining cards to be played in a game. This is merely for investigative purposes and support for electronic wagering when used. SMI will assume that these products would not be excluded based on this proposed regulation.

Last, SMI previously provided comments that there should be a definition of "electronic facsimile of chips" or "virtual chips" added to the regulation thereby permitting the use of same on electronic table games, which are in use in the Commonwealth. We propose that a definition of "virtual chip" be added and it be described as "an electronic facsimile of a chip that is used for betting on electronic gaming table or a fully automated gaming table."

Thank you for considering our comments to the proposed regulations.

Very truly yours,

Marie Jiacepello Jones

MJJ;ds

cc: ✓ Silvan Lutkewitte, III, Chairman (via regular mail)
Claire Svejkovsky, Executive Director of Compliance (via email & regular mail)
Sheri Johnson, Product Compliance Supervisor (via email & regular mail)
Christopher Cook, Product Compliance Technical Liaison (via email & regular mail)