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VIA E-MAIL & FEDERAL EXPRESS

Susan A. Yocum
Assistant Chief Counsel
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
P.O. Box 69060
Harrisburg, PA 17106-9060

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RE: Public Comment on Table Game Equipment Regulation # 125-137

Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is the holder of a table games operation certificate and a Category 1 slot machine license, which authorize GGE to operate Parx Casino 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 41 Pa.B. 238, on January 8, 2011.

The rulemaking at issue proposes to replace the temporary regulations for table game equipment with permanent regulations. Specifically, the Board is replacing temporary regulation Chapter 523 with permanent regulation Chapter 603a, which would govern the standards and procedures related to the table game equipment that is being utilized at Pennsylvania casinos.

The following list of comments addresses the Board's instruction on the handling of chips, dice, cards and other equipment. The list also provides practical suggestions regarding operational flexibility. GGE offers these comments and considerations to increase the functionality and efficiency of table game operations in Pennsylvania.

1. **58 Pa. Code §603a.1 (Definitions)** – As proposed, this section adds the term "Roulette Chip" to the permanent regulations and deletes the temporary regulation term of "Nonvalue Chip." Section 603a.1 defines "Roulette Chip" as a nonvalue chip that does not contain a denomination on either face which is used for wagering at the game of Roulette. GGE believes this definition and the removal of the term "Nonvalue Chip" unnecessarily limits casinos from utilizing nonvalue chips at other table games. For example, GGE would like the ability to use nonvalue chips at Sic Bo (Chapter 539) or Big Six Wheel (Chapter 533). GGE proposes replacing the term "Roulette Chip" with

the term "Nonvalue Chip," which could be defined as "a gaming chip with no monetary value that does not contain a denomination on either face which is used for wagering at a table game that the Board has approved."

2. **58 Pa. Code §603a.3(c) (Value Chips)** – As proposed, this section assigns the primary colors to be used for each denomination of value chips. Specifically, this section requires all \$1.00 value chips to be white in color. In GGE's experience, white value chips have the potential of getting dirty rather quickly and as a result, create a bad impression of the casino on its patrons. GGE proposes that casinos have the flexibility to choose between the colors of white and off-white for all \$1.00 value chips.
3. **58 Pa. Code §603a.3(d)(3) (Value Chips)** – As proposed, this section requires value chips to have the letters "PA" and the name of the city in which the casino is located. GGE has already received approval from the Board to use the name of the county in which the casino is located (i.e., Bucks County) for commemorative value chips. As a result, GGE proposes that the section in question be revised to allow casinos the flexibility to use either the name of the city or the name of the county in which the casino is located.
4. **58 Pa. Code §603a.3(j) (Value Chips)** – As proposed, this section requires all value chips of \$1,000 or more to have a uniform diameter of one and 11/16ths inches. GGE believes the \$1,000 or more threshold for value chips to have larger diameters is too low. Generally, chips with a uniform diameter of one and 11/16ths inches have a denomination over \$5,000, not "\$1,000 or more" as promulgated by the Board in this rulemaking. The larger diameter chips are more difficult for dealers to handle and do not fit as easily in standard equipment as the normal one and 9/16ths inches diameter chips. GGE proposes increasing the threshold amount for one and 11/16ths inches diameter value chips from "\$1,000 or more" to "\$5,000 or more."
5. **58 Pa. Code §603a.4 (Roulette Chips; Physical Characteristics)** – As proposed, this entire section deals with the requirements of Roulette Chips and the exclusive nature of these nonvalue chips to Roulette. GGE would like to reiterate Comment No. 1 above, which asks the Board to replace the term "Roulette Chips" with the term "Nonvalue Chips." GGE also proposes that the requirements in this section apply with equal force to the term "Nonvalue Chips" with the exception of the exclusive references of nonvalue chips to Roulette.
6. **58 Pa. Code §603a.5 (Roulette Chips; Permitted Uses)** – As proposed, this entire section deals with the permitted uses, inventory and impressments of Roulette Chips and the exclusive nature of these nonvalue chips to Roulette. GGE would like to reiterate Comment No. 1 and Comment No. 5 above, which ask the Board to replace the term "Roulette Chips" with the term "Nonvalue Chips." GGE also proposes that the requirements in this section be modified to more closely resemble the inventory, storage and impressments requirement for Tournament Chips as outlined in 58 Pa. Code

§603a.6, which is part of this rulemaking. Roulette Chips (i.e., Nonvalue Chips), like Tournament Chips, have no monetary cash value and cannot be redeemed at the cashier cage. As a result, there should not be the disparate treatment between Roulette Chips (i.e., Nonvalue Chips) and Tournament Chips.

7. **58 Pa. Code §603a.8(a) (Additional Sets of Gaming Chips)** – As proposed, this section requires a back-up set of value chips for the following denominations: \$25.00, \$100.00 and \$500.00. GGE proposes that the back-up set of value chips should begin at \$100.00 or more. GGE believes that the \$25.00 denomination level is too low for a back-up set of value chips due to their high frequency of use in the current gaming environment.
8. **58 Pa. Code §603a.10(c)(2) (Exchange & Redemption of Gaming Chips)** – As proposed, gaming chips can only be issued to patrons by dealers at banking and non-banking table games, the Poker Room cage, the Poker window cashier and chip runners. The regulations are silent regarding the main cashier cage or satellite cashier cages. GGE proposes that this section be expanded to allow casinos to issue gaming chips from their cashier cages with window cashiers. Under the current temporary regulations, nothing precludes or prevents a patron from receiving gaming chips from the Poker cage and playing banking table games with those chips. GGE believes it can efficiently and properly issue gaming chips from both its Poker Room cage and its cashier cages.
9. **58 Pa. Code §603a.10(f) (Exchange & Redemption of Gaming Chips)** – As proposed, this section deals with the exchange and redemption of Roulette Chips and the exclusive nature of these nonvalue chips to Roulette. GGE would like to reiterate Comment No. 1, Comment No. 5 and Comment No. 6 above, which ask the Board to replace the term “Roulette Chips” with the term “Nonvalue Chips.”
10. **58 Pa. Code §603a.13(o) (Dice)** – As proposed, the cancellation or destruction of dice must be completed within 72 hours of collection. GGE proposes that the Board create an exception to the 72 hour rule when a casino finds it necessary to hold dice from tables with questionable activity that does not appear suspicious (e.g., significant losses). GGE proposes that the Board allow casinos to hold dice for a reasonable period of time beyond 72 hours when questionable activity occurs at a table game in order to conduct a full, internal investigation prior to destroying the dice.
11. **58 Pa. Code §603a.15(g)(2) (Cards; Physical Characteristics)** – As proposed, this section requires that multiple decks of cards that are packaged and sealed in a set must have a label visible on that package that provides for the game which the cards are to be used. GGE uses a package of cards that are preinspected and reshuffled in accordance with current regulations for Blackjack. GGE proposes eliminating this section’s requirement or modifying it because it is inefficient and unnecessary. For example, GGE would like to use its preinspected and reshuffled package of cards for either Blackjack or Baccarat. However, the current form of this regulation would force GGE to have


one box of preinspected and reshuffled packages for Blackjack and another delivery box for Baccarat.

12. **58 Pa. Code §603a.16(i) (Cards; Receipt, Storage, Inspection & Removal)** – As proposed, this section requires a dealer to follow a specific set procedures if he or she finds a card unsuitable for use, a missing card or an extra card after a visual inspection pursuant to 58 Pa. Code §603a.16(h). GGE uses packages of cards that are preinspected and reshuffled in accordance with current regulations. As a result, GGE is exempt from the inspection process of section 603a.16(h). GGE proposes that language be added to section 603a.16(i) to clarify that decks of cards that are preinspected and reshuffled in accordance with subsection (u) or (v) are exempt from both sections 603a.16(h) and (i).

13. **58 Pa Code §603a.18(g) (Pai Gow Tiles)** – As proposed, this section requires a pit manager to immediately replace an entire set of thirty-two (32) Pai Gow tiles if a dealer or floorperson detects one (1) damaged tile. GGE believes this requirement is extreme, costly and unnecessary. Under the current temporary regulations and this proposed rulemaking, a casino employee can replace a damaged card from a deck in use without replacing the entire deck. See 58 Pa. Code §523.16(k); 58 Pa. Code §603a.16(k)(as proposed). GGE proposes a similar procedure for Pai Gow tiles. Specifically, GGE requests that this section be revised to allow Pennsylvania casinos to replace a damaged Pai Gow tile with an identical tile from another set. Each set of Pai Gow tiles cost approximately \$120.00, and requiring the entire set of tiles to be removed for one damaged tile is excessive. Moreover, New Jersey recently revised its regulations regarding Pai Gow tiles to allow casinos in Atlantic City to replace one damaged tile with an identical tile from another set. See Temporary Rule N.J.A.C. 19:46-1.19B (Casino Control Comm'n, May 24, 2010).

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,



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Greenwood Gaming & Entertainment, Inc.

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cc: Silvan B. Lutkewitte, III, Chairman, Independent Regulatory Review Commission
Thomas C. Bonner, Esq.