

2890

Cooper, Kathy

From: Schalles, Scott R.
Sent: Friday, April 15, 2011 3:21 PM
To: Cooper, Kathy; Gelnett, Wanda B.
Cc: Wilmarth, Fiona E.; Smith, James M.
Subject: FW: 125-129 PGCB Final-Form Rulemaking & 125-142 PGCB Proposed Rulemaking

Public comment on #2890

From: Mike Keelon [mailto:mkeelon@meadowsgaming.com]
Sent: Friday, April 15, 2011 3:19 PM
To: syocum@state.pa.us
Cc: Schalles, Scott R.; Guy Hillyer; Sean Sullivan; Ryan Toland
Subject: FW: 125-129 PGCB Final-Form Rulemaking & 125-142 PGCB Proposed Rulemaking

Hi Susan,

Below are comments that WTA would like to file relating to PGCB Proposed Rulemaking 125-142.

Thanks,
Mike

Michael S. Keelon

Director of Compliance
The Meadows Racetrack & Casino
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The Meadows Racetrack & Casino

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§609a.4(a)(1)

(1) Two or more employees holding the job positions of credit manager, assistant credit manager, credit shift manager, credit executive, or other key employee in a direct reporting line above the credit manager.

609a.4(a)(1) We need the ability to add specified employees (holding a Key License) to the credit authorization list. Examples of such employees would include the Director of Slot Operations, the Director of Table Games and the Assistant General Manager. The current regulation restricts properties which do not utilize a Credit Department to a very limited number of people having the ability to approve credit.

§609a.15(b)(1)

(1) The personal check must be drawn on the bank account in patron's credit file upon which all Counter Checks are to be drawn.

609a.15(b)(1) We need the ability to accept any personal check for the redemption of counter check providing the verification process has been completed. This would allow patrons more options to pay and would allow for a spouse or significant other to pay markers on their behalf. Many credit customers use multiple accounts from different banks and this would allow for several accounts to be utilized once they have been verified and processed. Many couples also pay for both parties' markers at one time and under current regulations this is not permitted.

§609a.15(d)

(d) If a patron has more than one unredeemed Counter Check, the most recently dated Counter Check shall be redeemed or partially redeemed first.

609a.15(d) Patrons who utilize credit in other jurisdictions are accustomed to redeeming the oldest markers first. The current regulation is the genesis for a significant amount of patron confusion and creates the potential for patron disputes. Patrons should not be required to pay the most recently issued counter check first. Rather than adopting a "Last in- First out" (LIFO) approach to redemption of counter checks, a "First in- First out (FIFO) approach, which is more the industry standard, should be permitted. The LIFO approach causes the situation where a counter check which may have been written on the previous day could come due for deposit at the same time that an older counter check comes due. Patrons expect the time periods where counter checks they sign to come due for deposit to be a consistent time frame. Each operator should have the option of allowing the patron to redeem the oldest counter check if the patron has a good payment history.

§609a.16(a)(1)

(1) The personal check is drawn on the bank account in patron's credit file upon which all Counter Checks are to be drawn.

609a.16(a)(1) We need the ability to accept any personal check for the substitution of a counter check providing the verification process has been completed. This would allow patrons more options to pay and would allow for a spouse or significant other to pay markers on their behalf. Many credit customers use multiple accounts from different banks and this would allow for several accounts to be utilized once they have been verified and processed.

§609a.17(a)(1)

(1) Fifteen days after the date of the Counter Check or the date on the personal check that has been substituted for the Counter Check if the amount of the check is less than \$5,000.

609a.17(a)(1) We need the ability to aggregate the total amount of credit issued in one gaming day to count toward the time limitation as to when the counter checks would be deposited. For example, if a patron takes 10, \$2,000 markers in one gaming day, we need be able to give them 30 days until the markers are due, rather than the 15 days for each counter check when treated individually. Patrons expect to be given the allotted time for the total amount they have received in markers and are confused when being instructed that each individual marker is treated individually, by amount.

From: Yocum, Susan (PGCB) [mailto:syocum@state.pa.us]
Sent: Friday, January 28, 2011 04:25 PM
To: Lynette Lee; Valley Forge-Kevin Hayes; Harrah's Chester-Travis Lamb; Hollywood-John Newman; Mike Keelon; Mohegan-Alan Kohler; Mohegan-Jim Doherty; Mt Airy-Don Shiffer; Nemaacolin & Valley Forge-Adrian King; Lewis, Pamela (PGCB); Parx-Tom Bonner; Presque Isle-Rita Smith; Presque Isle-Robert Norton; Rivers & SugarHouse-Rhonda Gilchrist; Sands-Holly Eicher
Subject: 125-129 PGCB Final-Form Rulemaking & 125-142 PGCB Proposed Rulemaking

Attached are the materials that were adopted at Wednesday's Board meeting. Here is brief summary:

Proposed Rulemaking 125-142 transitions three more of the temporary table games chapters into proposed form. The 30-day comment period will begin once published in the Pennsylvania Bulletin.

- Chapter 601a. on General Table Games Provisions: requires operators to submit to Gaming Operations a Rules Submissions form for all table games with options for players; requires operators to provide gaming guides to patrons regarding the rules of play for all table games offered in the licensed facility; requires notice to patrons regarding the minimum and maximum wagers; addresses the calculation of gross table game revenue.
- Chapter 609a. on Credit: sets forth the requirements for the issuance of credit to slot and table game patrons including establishing a credit file and running credit checks to determine credit worthiness; addresses the placement of patrons on the voluntary credit suspension list.
- Chapter 611a. on Table Game Minimum Training Standards: contains the minimum training and proficiency requirements for dealers and supervisors of table games; requires a table test and completion of CPR training.

Final-Form Rulemaking 125-129 on Gaming Junkets.

- Amends the regulation for consistency with the requirements of Act 1.


- Requires owners, officers and directors of the Gaming Junket Enterprise to complete applications and a background investigation similar to owners, officers and directors of gaming service providers. They will therefore no longer be required to be licensed as principals.
- Amends for clarity some of the reporting requirements on gaming junkets.

If you have any questions, please feel free to contact me.

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