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May 2, 2011

**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

**RE: Public Comment on Table Game Equipment Regulation # 125-142**

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. 2011, on April 2, 2011.

The rulemaking at issue proposes to replace the temporary regulations for general table game provisions, casino credit and table game minimum training requirements. Specifically, the Board is replacing temporary regulation Chapter 521 with permanent regulation Chapter 601a, which would govern the general provisions for table game operations. The Board is also replacing temporary regulation Chapter 526 with permanent regulation Chapter 609a, which would govern the standards and procedures related to the issuance, redemption and collection of casino credit. Finally, the Board is replacing temporary regulation Chapter 527 with permanent regulation Chapter 611a, which would govern the table game minimum training standards.

The following list of comments addresses various provisions of the Board's proposed rulemaking. 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 as well as to coincide with industry practices in New Jersey.

1. **58 Pa. Code 601a.6(c) (Minimum & Maximum Wagers)** – GGE respectfully suggests additional language to proposed regulation 601a.6(c), so it parallels casino industry standards, especially in connection with high limit play. Patrons in high limit table game areas strongly prefer (as do most patrons) that dealers and boxpersons do not

touch their wagers prior to the outcome of the table game. To protect both the patrons and the casino, the dealer or boxperson must announce prior to dealing the round of play, the following phrase: "Pay or take to the table limit." This phrase provides the patron with the option of playing the wager at the table maximum or playing the wager at the amount placed in the betting area, irrespective of the table maximum. In high limit table game areas, the casino and patron do not want to stop the game and look at each wager that is close to the table maximum. Rather, the dealer or boxperson gives the patron a verbal choice. GGE proposes that the following sentence be added to the end of section 601a.6(c): "Certificate holders may utilize the phrase "Pay or take to the table limit" if a dealer or boxperson verbalizes the phrase in a tone of voice calculated to be heard by the patron who made the wager and the floorperson assigned to the gaming table."

2. **58 Pa. Code 601a.7(c) (Rules of the Game)** – As drafted, proposed regulation 601a.7(c)(2) requires a 30 minute wait period for all changes to the minimum and maximum wagers at a table game. GGE respectfully proposes the addition of a subsection to 58 Pa. Code 601a.7(c)(2) that recognizes the significant distinction between raising table minimums and lowering table minimums. GGE has no issue with the 30 minute wait period for a raise of table minimums. However, GGE believes that it should be allowed to lower table minimums without the requirements of subsection 601a.7(c)(2)(i)-(ii). There are significant patron protection issues associated with raising table game minimum wagers without any notice. However, those same patron protections are not implicated in lower table game minimum wagers. Lowering table game minimum wagers without notice is necessary to accommodate patrons and the casino's business levels when demand is not as great as anticipated. GGE proposes that the following subsection be added after section 601a.7(c)(2)(iii): "(iv) Certificate holders may lower the permissible minimum wager at a table game at any time without satisfying subsections (c)(2)(i) and (c)(2)(ii)."

3. **58 Pa. Code §609a.4 (Approval of Credit Limits)** – As drafted, proposed regulation 609a.4, which governs the approval of credit limits, does not discuss or describe the requirements of a temporary credit increase—i.e., This Trip Only (TTO) increase. New Jersey regulations are very clear and allow casinos to issue a TTO increase. See N.J.A.C. 19:45-1.27(h). Under New Jersey regulations, a casino may issue a TTO increase to a patron once every thirty (30) days for an amount up to an additional 25% of the patron's approved credit line. Under the New Jersey regulatory framework, the TTO increase does not require a new verification of the patron's credit history because it is a limited increase that may only be processed once every 30 days. For example, a patron with a \$10,000 credit limit could request and receive, with casino approval, a TTO increase up to \$2,500, once every thirty (30) days under the New Jersey regulations without his credit history being verified again by the casino. GGE proposes that the Board adopt the New Jersey regulatory framework for TTO increases as described in N.J.A.C. 19:45-1.27(h).

A TIO increase is designed to accommodate a patron's request to temporarily increase his credit limit during a short duration of his play. There are instances where an individual player will be in the middle of a game and require additional credit to finish playing that game. A TIO increase allows the casino to decide whether to accommodate that patron's request and allow him to continue playing a specific table game without holding up the remainder of the game while the patron's credit history is rechecked. If the Board were to require a new verification of the patron's credit history for each TIO increase, the casino would, in essence, be processing a permanent credit increase, which could inflate credit limits on a permanent basis.

4. **58 Pa. Code §609a.14 (Issuance & Reconciliation of Counter Checks)** – As drafted, proposed regulation 609a.14(d) requires a slot supervisor or above to obtain the amount of the requested counter check, verify the counter check, transport the funds to the patron and present the original and all duplicates of the counter check to the slot patron for signature. GGE believes this requirement significantly slows down the processing of counter checks at the convenience and expense of the patron. GGE proposes that section 609a.14(d) be amended to change the term “slot supervisor” to “slot attendant or above.” This change will allow for more efficient processing of counter checks by the cashier cage and slot operations departments.
5. **58 Pa. Code §§ 611a.2(b)** – As drafted, proposed regulation 611a.2 requires specific training hours for different types of table games. Subsection (b) provides a dealer, who is trained in one table game, the option to be trained in a different table game so long as the dealer completes the total number of training hours required for the new table game. Finally, proposed regulation 611a.3 requires a certificate holder to include in its training program eight (8) different operational procedures that are universal to all table games. See 58 Pa. Code § 611a.3(1)-(8) (*Temporary Rulemaking* 41 Pa.B. 2011). GGE respectfully proposes that subsection 611a.2(b) be modified to recognize that dealers who were previously trained in one table game possess adequate training in the various operational procedures identified by proposed regulation 611a.3(1)-(8). The curriculum for the additional table game training would not need to include the procedures of 58 Pa. Code § 611a.3(1)-(8) because these procedures were already covered in the initial table game training that the dealer received. As a result, the total number of training hours for a dealer to be trained in a second table game could be reduced. GGE proposes the following modification to proposed regulation 611a.2(b):

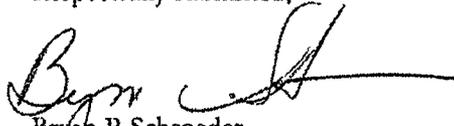
“(b) A dealer who has completed a course of training in accordance with subsection (a) and would like to be trained to deal a different game type shall complete the minimum hours of instruction required for the different game type, minus any training hours that are associated with the procedures and requirements of 58 Pa. Code § 611a.3, and successfully complete the table test required under § 611a.5 (relating to table test; employee personnel file). For example, if a dealer has completed the 100 hours of instruction in Blackjack and 20 of those hours were for section 611a.3 procedures, the dealer shall complete an additional 140 hours of instruction before dealing Craps, Mini-

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Craps or Pai Gow Tiles or an additional 60 hours of instruction before dealing  
Roulette.”

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,



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

bps

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