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April 18, 2011

Sent via Electronic and Certified Mail

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

RE: Public Comment on General Provisions, Credit and Training Standards; Regulation #125-142

Dear Ms. Yocum:

Thank you for the opportunity to comment on proposed rulemaking #125-142. Attached are comments which Washington Trotting Association would like to make regarding this proposed rulemaking. Because specific aspects of this proposed rulemaking will have direct impact on Washington Trotting Association's operations, we hope that these comments will be taken into consideration when the final-form rulemaking is drafted.

Please don't hesitate to contact me with any questions or concerns that you may have relative to this issue.

Sincerely,

Michael S. Keelon

Enc.

cc: Guy Hillyer, Executive Vice President – Cannery Casino Resorts (via email)
Sean A. Sullivan, Vice President/General Manager – Meadows Racetrack and Casino
Ryan Toland, Vice President of Compliance – Cannery Casino Resorts (via email)
Lance Young, Director of Table Games – Meadows Racetrack and Casino
Scott R. Schalles, Analyst – Independent Regulatory Review Commission (via email)

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WTA Comments on Proposed Rulemaking #125-142

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) 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) 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) 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) 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.