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May 3, 2011

Susan Yocum  
Director of Regulatory Review  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
5<sup>th</sup> Floor, Verizon Tower  
Harrisburg, PA 17101

Re: **Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack  
Comments on Proposed Rulemaking Regulation No. 125-142**

Dear Ms. Yocum:

On behalf of Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack ("Harrah's"), Harrah's respectfully submits these comments to the Pennsylvania Gaming Control Board's ("Board") Temporary Table Game Rulemaking No. 125-142. Harrah's would like to thank the Board for the opportunity to comment toward the Board's temporary rules, and respectfully requests the Board take into consideration the following suggestions.

**I. COMMENTS FOR PROPOSED RULEMAKING NO. 125-142**

**§609a.1. – Definitions**

The Board's temporary regulation §609a.1 defines a credit clerk as an employee of the cage or credit department who is responsible for receiving, processing and verifying the information in credit application form patrons and who does not have authority to grant credit or credit limit increases.

In order to better utilize that Credit Department employees, Harrah's believes it would be prudent to allow a person acting in the role of a credit clerk the authority to grant or increase credit and to include following or similar verbiage, "provided that only one employee holding the job position of

credit manager, assistant credit manager, credit shift manager, credit executive, or other key employee in a direct reporting line above the credit manager acts in this capacity on a patrons credit file.”

§609a.3 (c) – Application and verification procedures for granting credit.

Section §609a.3 (c), identifies procedures a credit clerk must perform prior to a patron’s credit limit being approved by a certificate holder. Specifically, subpart (c) (4) (ii) requires the date the account was opened be documented as part of the credit application verification process.

It is important to note that many large banking institutions will not give this information because it is may be utilized as a security question. As such, Harrah’s believes additional language such as “or that the patron has had a financial relationship with their banking institution for greater than one year” be added to this subpart to provide relief to certificate holders in those instances where financial institutions will not release this information. By using the credit bureau to validate a relationship with the patron, we are reducing the chance of a fraudulent account.

§609a.3 (b) – Application and verification procedures for granting credit.

Section §609a.3 (c), identifies procedures a credit clerk must perform prior to a patron’s credit limit being approved by a certificate holder. Specifically, subpart (c) (4) (vii) requires that if the verification is done telephonically, the credit clerk or bank verification service shall request written documentation of all information obtained as soon as possible to be included in the patron’s credit file.

Harrah’s believes that by adding the following or similar language, “provided however that a request in writing would not be necessary if the credit clerk spoke with a live person and recorded the name, title, date and time of the telephone conversation in the patron credit file”, all of the required information would be adequately obtained and recorded.

§609a.4 (b) – Approval of Credit Limits.

Section §609a.4 (b), identifies the documentation required to be included in the patron’s credit file upon approval of credit. Specifically, subpart (b) (4) indicates that a verbal authorization may be obtained from one of the employees required to approve credit limits.

Harrah’s would like to revise this statement to indicate that “a certification holder may obtain verbal authorization from one or both of the employees required to approve credit limits....”, thereby allowing flexibility to the certificate holder in circumstances when there may be only one Credit Department Representative on the property at a particular time.

§609a.4 (c) – Approval of Credit Limits.

§609a.5 (e) – Derogatory information; reduction or suspension of credit.

In §609a.4 (c) (2), it is noted that prior to approving a credit limit increase, an employee of the certificate holder shall reverify the patron information in accordance with 609a.3 (c). Likewise, in §609a.5 (e) it is noted that if a patron's credit privileges have been suspended, the certificate holder's credit department shall reverify the patron's address, current casino credit limits and outstanding balances, outstanding indebtedness, and personal checking account information as required under 609a.3(c)(a) – (4).

As the Board may be aware, if a patron bounces a check any licensed facility, obtaining the required information is redundant, time consuming, costly and will likely cause the patron interruption in their ability to utilize casino credit. Therefore, Harrah's Chester believes that the inclusion of the following or similar verbiage will alleviate some of this strain, "except that when reverifying the patrons personal checking account, only a current balance is required to be updated".

Harrah's wishes to thank the Board for requesting input on these matters and hope our comments are helpful for your consideration.

Sincerely,

Michelle Yarrow  
Regulatory Compliance Manager  
Harrah's Chester Casino and Racetrack

C: Silvan Lutkewitte, III, Chairman (IRRC)