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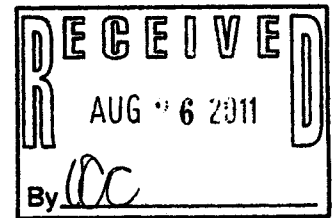
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August 22, 2011

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

Re: Pennsylvania Blackjack Established Rules

Dear Ms. Yocum:

I understand that the Gaming Commission is currently considering possible changes to the established rules which casinos in Pennsylvania must offer to their blackjack playing patrons. As a frequent player of the game, I am writing to express my strong opposition to any change in the following rules:

1. The rule that requires that the casino pay a player blackjack at 3-2 odds.
2. The rule that requires that dealers stick when they have a soft 17 total.
3. The rule that requires that the casino offer late surrender as an option to the player.

I recall reading an article in a Pittsburgh newspaper quoting your executive director Kevin O'Toole regarding the rules for blackjack in Pennsylvania. Mr. O'Toole indicated that the rules were initially established after a very careful review of rules in other jurisdictions and that, in his opinion, the blackjack rules in Pennsylvania provided a fair balance between the casinos and the players. He was right then and nothing has happened during the first year of table game operations in Pennsylvania to suggest otherwise. Pennsylvania's casinos are doing very well at their table games, including blackjack. And, of significance, they are taking market share away from their competition in New Jersey. I suggest that their success in taking market share is due in part to the established blackjack rules. Any change in those rules may well cause patrons to return to the New Jersey casinos and spend their gambling dollars there. It is well known among players that the New Jersey casinos are much more favorable than those in Pennsylvania when it comes to marketing incentives such as room comps, meal comps and entertainment comps. Pennsylvania casinos need the current rules to avoid an erosion in their player base.

I urge the commission to leave the rules as they are.

Yours sincerely,

Roy A. Archbell, Jr.

RAAjr/mta