

Mary R. Sprunk
Office of the Chief Counsel
Department of Revenue
P.O. Box 281061
Harrisburg, PA 17128-1061

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9/20/2011

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Alonewith Company
d.b.a. St. Thomas Gaming
63 Opal Drive
Chambersburg, PA 17202
PA Distributor D-0393

Dear Sir/Madame:

I am a PA-licensed Distributor of Small Games of Chance. I am writing is strict objection to the proposed rule change 901.632(b), which states:

"A registered manufacturer may not produce a pull-tab game or punchboard for sale or use in this Commonwealth that permits the operator of or a participant in the game to choose between optional game rules, payout structures or methods of operating the game".

This idea is TOTALLY UNACCEPTABLE. Here are a few of the many problems with this proposal;

1. This rule would invalidate over 80% of my inventory. I expect all other PA Distributors would likely have the same problem. My inventory constitutes the bulk of my life savings, and I certainly cannot afford to "write it off".
2. This change would require a significant increase in the inventory I would need to carry, in order to satisfy my customers. It makes absolutely no business sense to carry multiple versions of the exact same game except for the pre-packaged seal cards (flairs). For example, if I have ten (10) cases of 2640-count Red, White, and Blue, paying one seal winner \$200.00, I should not need to buy ten (10) additional cases of the exact same product with the exception that the latter games would pay two seal winners at \$100.00 each. The current method using a single seal card with the option to play the game with different seal prize distributions makes perfect sense. This option does not in any way alter the game total payout, percentage payout, nor any other aspect of the odds.
3. Most manufacturer's "stock" games contain seal card options. Passing this proposed rule would significantly limit small games operator's selection and variety of available games.
4. This rule change, if passed, would likely put me out of business. This proposal unfairly targets small businesses like mine. While large, multi-state distributors

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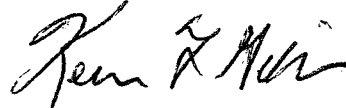
may be able to absorb the losses and additional inventory requirements this proposal would generate, small businesses will be literally crushed.

5. I do not understand what perceived problem this proposed rule is trying to fix! If operators choose to operate games in an illegal method, this does nothing to stop them from continuing to do so. For example, if an operator wanted to alter the game play and operate the game with a progressive payout, this rule change does absolutely nothing to prevent that practice.

So in conclusion, this proposed rule change is everything bad and nothing good. I hope the Department will make the correct decision and abandon this proposed change.

Additionally, the elimination of "Variety Packs" is another terrible idea. I hope you will drop that proposed rule change as well.

Respectfully,



Kevin F Gillan

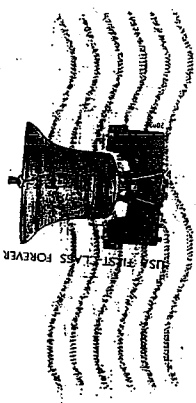
Owner

St. Thomas Gaming

ST. THOMAS ENROUTE
63 ORLE DRIVE
ST. THOMAS, PA 17202

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MARY R SPAUR
OFFICE OF CHIEF COUNSEL
DEPT. OF REVENUE
PO BOX 281061
HARRISBURG, PA 17128-1061

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