Gilpin Township Volunteer Fire Department

2905

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September 23, 2011

Ms. Mary R. Sprunk, Regulatory Coordinator PA Dept. of Revenue, Office of Chief Counsel P. O. Box 281061 Harrisburg, PA 17128-1061

Dear Ms. Sprunk:

IRRC IRRC 2011 SEP 30 A 9:

I am writing on behalf of my organization to object to the proposed regulations by the Department of Revenue regarding Small Games of Chance, specifically proposed Regulation #15-451

The changes you have proposed would directly impact our organization as well as the players of our small games of chance. Specifically, we have concerns about the following:

- 1) Prohibiting variety packs with one form number and different names. This change would require every game to have a separate form title and eliminate variety packs which share this number. This would greatly affect the ability for us to offer different games to our players.
- 2) Prohibiting multiple payout options. With this change, distributors would be forced to select the best selling games and eliminate other options from us to offer our players. This change would also eliminate our ability to choose the payout option that works best for us.

As a small organization, the changes you have proposed will have a significant impact on the operation of small games of chance, one of our only sources of income for our volunteer organization. Many organizations in our area and around the Commonwealth thrive on the proceeds from these games to raise money for ourselves and other charities. Any change in the rules of the game or payout options could significantly reduce our fundraising options.

Please take these comments and concerns into serious consideration.

Sincerely,

Phillip A. McConville, Bingo Committee Chair, Gilpin Twp. VFD

SEP 26 2011

SEIGE OF CHIEF COUNSEL