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Alan C. Kohler
717.237.7172
akohler@eckertseamans.com

December 8, 2011

VIA HAND DELIVERY

Scott R. Schalles
Regulatory Analyst
IRRC
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

RE: Final Form Amendment to 40 Pa. Code § 3.52
IRRC # 2912

Dear Mr. Schalles:

As you are aware, Greenwood Gaming and Entertainment, Inc. d/b/a Parx Casino and Racetrack ("Parx") and Downs Racing, L.P. d/b/a Mohegan Sun at Pocono Downs ("MSPD") have an ongoing interest in the above referenced Pennsylvania Liquor Control Board ("LCB") final form rulemaking before the Commission. The final form regulation, which is an amendment to 40 Pa. Code § 3.52, is essentially a resubmission by the LCB on November 29, 2011, of a final form rulemaking which was disapproved by the Commission on October 28, 2011.

Please be informed that Parx and MSPD have reviewed the November 29, 2011 submission by the LCB and have no objection to Commission approval of the rulemaking. While Parx had some initial concerns with the scope of the resubmitted language, it is now satisfied with the final form language based on assurances from LCB staff that the LCB's Bureau of Licensing has reviewed Parx's current operational structure and is of the view that the pending final form regulation resolves all compliance concerns in this area pertaining to Parx.

Given, and in reliance on, the foregoing, Parx and MSPD respectfully request the Commission to approve IRRC No. 2912 at its December 15, 2011 Public Meeting.

Respectfully submitted,


Alan C. Kohler

ACK/jls

cc: Rodrigo Diaz, LCB
Christopher Herrington, LCB