

Comments of the Independent Regulatory Review Commission



Pennsylvania Gaming Control Board Regulation #125-204 (IRRC #3164)

Four Card Prime and Cajun Stud; Table Game Rules of Play

May 10, 2017

We submit for your consideration the following comments on the proposed rulemaking published in the March 11, 2017 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a (a)) directs the Pennsylvania Gaming Control Board (Board) to respond to all comments received from us or any other source.

- 1. Section 683a.8. Procedures for dealing the cards from a manual dealing shoe.**
Section 683a.9. Procedures for dealing the cards from the hand. -- Clarity.

These sections do not indicate how or when the three community cards are to be dealt. By comparison, parallel Subsection 683a.10(c)(2) (relating to Procedures for dealing the cards from an automated dealing shoe) specifically provides this information in a sequential manner so that it is clear to the dealer and player how and when those cards are to be dealt. We recommend amending Sections 683a.8 and 683a.9 to be consistent with Subsection 683a.10(c)(2).

- 2. Section 683a.11. Procedures for completion of each round of play. -- Clarity; and Reasonableness.**

Paragraph (a)(2) states that “each player shall keep his five cards in full view of the dealer at all times.” We note that each player is only dealt two cards. The remaining three cards used to make each player’s hand are not dealt to the player but rather to an area designated for the community cards. How is the player to comply with this provision when three of the five cards are controlled by the dealer and shared by all players? The Board should amend Paragraph (a)(2) to address this concern or explain in the Preamble to the final-form regulation the Board’s intent.