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File No.: 07599-00006

September 21, 2009

VIA EMAIL AND FEDERAL EXPRESS

Richard M. Sandusky
Director of Regulatory Review
Pennsylvania Gaming Control Board
303 Walnut Street
P.O. Box 69060
5th Floor, Strawberry Square
Harrisburg, PA 17101

Re: Washington Trotting Association, Inc., License No.: F-1316
Comments to Proposed Rulemaking 125-105

Dear Mr. Sandusky:

Please be advised that we represent Washington Trotting Association, Inc. ("WTA"), a Category 1 slot operator licensee. On behalf of WTA, we are submitting the following comments to the Proposed Rulemaking No. 125-105, proposed amendments to regulations 58 Pa. Code § 465a.26(b) regarding Jackpot and Credit Meter Payouts.

The Pennsylvania Gaming Control Board (the "Board") provides an explanation of amendments to Chapter 465a, stating that 58 Pa. Code § 465a.26(b), former paragraphs (3), (4), and (5), renumbered as paragraphs (2), (3), and (4), were amended to give slot machine licensees greater flexibility as to who they may designate to act as a witness for jackpot or credit meter payouts of various amounts. As amended, the new regulations require that increasingly senior personnel verify jackpot payouts at certain thresholds. Currently, WTA's practice is that a slot floor person or higher verifies all jackpot payouts, but that as the jackpot amount increases, increasingly senior personnel are required to prepare and pay-out the winning jackpot.



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Accordingly, WTA requests that the Board revise the subject proposed regulation to mandate the minimum levels of authority required for preparing and verifying a jackpot or credit meter payout slip, without specifying which authority level is required to prepare and which authority level is required to verify.

Very truly yours,



Mariel J. Giletto

cc: Arthur Coccodrilli, Independent Regulatory Review Commission
Guy Hillyer, Executive Vice President
Michael S. Keelon, Manager of Compliance