



Fox Rothschild LLP
ATTORNEYS AT LAW

Midtown Building, Suite 400
1301 Atlantic Avenue
Atlantic City, NJ 08401-7212
Tel 609.348.4515 Fax 609.348.6834
www.foxrothschild.com

Eric M. Wood, Esq.
Office Managing Partner

Marie Jiacopello Jones
Direct Dial: (609) 572-2259
Email Address: mjones@foxrothschild.com
File No.: 44337-00047

February 15, 2010

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: Shuffle Master, Inc., License No.: M-1078
Comments to Proposed Rulemaking 125-108**

Dear Mr. Sandusky:

Please be advised that we represent Shuffle Master, Inc. ("Shuffle Master"), a Manufacturer licensee. On behalf of Shuffle Master, we are submitting the following comments to the Proposed Rulemaking No. 125-108, proposed amendments to regulations 58 Pa. Code § 433a regarding Principal Licenses.

Specifically, the Pennsylvania Gaming Control Board (the "Board") proposed amendments to 58 Pa. Code § 433a.2(e), which will require officers and directors of a licensee to submit a completed Multi-Jurisdictional Personal History Disclosure Form ("MJPHD") and the Pennsylvania Supplement ("PA Supplement") to the MJPHD within thirty (30) days of performing any duties or exercising any powers as an officer or director. Shuffle Master submits that the MJPHD and the PA Supplement require an individual to gather and disclose an substantial amount of information dating back several years and that it often takes an individual longer than thirty (30) days to arrange all the information and complete the forms. Shuffle Master submits that thirty (30) days is a burdensome time constraint to impose on individuals to accurately complete the MJPHD and PA Supplement. Further, Shuffle Master submits that



Fox Rothschild LLP
ATTORNEYS AT LAW

Richard M. Sandusky

February 15, 2010

Page 2

certain other jurisdictions permit individuals to complete the MJPHD and any other required forms within thirty (30) days of appointment to the position as officer and director and also permit extensions of the thirty (30) day filing requirement upon request. Those jurisdictions permit the officer and director to perform their duties while completing the required forms and, if during the course of the review of the forms and investigation into the individual, the individual is found unsuitable, the individual is required to cease performing his/her duties. Accordingly, Shuffle Master submits that the thirty (30) day time constraint is unduly burdensome and; therefore, requests that the regulation be revised to allow individuals to perform his/her duties prior to filing an MJPHD and PA Supplement and allow the Board to grant an extension of time for the individuals to file the forms. Alternatively, Shuffle Master requests that the Board be permitted to grant extensions of time for an individual to file the MJPHD and PA Supplement.

The Board also has proposed amendments to 58 Pa. Code § 433a.5, which will allow an Institutional Investor to file an Institutional Investor Notice of Ownership with the Bureau of Licensing in lieu of applying for principal licensure. However, the proposed regulation does not impose a specific time frame for filing the Institutional Investor Notice of Ownership. Accordingly, Shuffle Master requests that the proposed regulation include a time frame that the Institutional Investor Notice of Ownership will be required to be file the form and allow for the Bureau of Licensing to permit an extension of time to file same.

Thank you for your time and consideration of these comments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Marie Jones', with a long horizontal flourish extending to the right.

Marie Jacopello Jones

MJJ:bb

cc: Arthur Coccodrilli, Independent Regulatory Review Commission
Claire Svejovsky, Executive Director of Compliance