



February 7, 2011

Susan A. Yocum
Assistant Chief Counsel
PGCB
P.O. Box 69060
Harrisburg, PA 17101-8323

Re: Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack
Comments on Proposed Rulemaking Regulation Nos. 125 - 137

Dear Ms. Yocum:

On behalf of Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack ("Harrah's"), Harrah's respectfully submits these comments to the Pennsylvania Gaming Control Board's ("Board") Proposed Regulation Nos. 125 - 137. Harrah's would like to thank the Board for the opportunity to comment and share gaming industry best practices toward the Board's temporary rules, and respectfully requests the Board take into consideration the proposed revisions and comments where applicable:

603a.3

(k) Each value chip with a denomination below \$25 must contain at least one anticounterfeiting measure and each value chip with a denomination of \$25 or more must contain at least two anticounterfeiting measures in addition to those items specifically required to appear on the face or edge of a value chip by this section.

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603a.5

(c) An impressment of the Roulette chips assigned to each Roulette table shall be completed at least once every quarter as specified in the certificate holder's internal controls. The certificate

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holder shall record the results of the impressment in the chip inventory ledger required under § 603a.11 (relating to receipt of gaming chips or plaques from a manufacturer or supplier; inventory, security, storage and destruction of chips and plaques) and perform the impressment as follows:

(e) Each certificate holder shall record in the chip inventory ledger required under § 603a.11 and submit to the Bureau of Gaming Operations, a monthly summary of the Roulette chip inventory. This monthly summary must include, at a minimum, the following information for each Roulette chip color and design:

Deleted: for each Roulette table

603a.6

(b) The identifying characteristics of a tournament chip, at a minimum, must include:

(1) The name, logo, or other approved identification of the certificate holder using the tournament chip.

(2) The denomination of the chip.

Deleted: (2) The word "Tournament."

(3) The phrase "No Cash Value."

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(4) Color or design combinations, approved by the Bureau of Gaming Operations, so as to readily distinguish the tournament chips from:

Comment: Having the terms "tournament" and "no cash value" is redundant.

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(i) The Roulette chips used for the play of Roulette at the licensed facility.

(ii) The value chips issued by any certificate holder.

(iii) Poker room rake chips.

(d) An inventory of all tournament chips to be used in a tournament shall be conducted by the certificate holder prior to the start and after the completion of each tournament. A copy of the inventory report shall be submitted to the Bureau of Gaming Operations no less than once per quarter.

Comment: With the addition of daily tournaments, sometimes 2 per day, it would be unduly burdensome to submit every tournament chip inventory within 2 days of the event.

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603a.10

(o)

Deleted: Each certificate holder shall post, in a prominent place on the front of the cashiers' cage, any satellite cage and the Poker room cage, a sign that reads as follows: "Gaming chips or plaques issued by another licensed facility may not be used, exchanged or redeemed in this licensed facility"

603a.11

(c) Gaming chips or plaques not in active use shall be stored in any of the following:

(1) A vault located in the main bank.

(2) Locked cabinets in the cashiers' cage or Poker Cage.

(g) At least once every quarter, as specified in the certificate holder's internal controls, each certificate holder shall inventory all sets of value chips, Roulette chips and plaques in its possession and record the result of the inventory in the chip inventory ledger. A physical inventory of value chips, Roulette chips and plaques not in active use shall only be required annually if the inventory procedures incorporate the sealing of the locked compartment containing the value chips, Roulette chips and plaques not in active use. The procedures to be utilized to inventory value chips, Roulette chips and plaques shall be submitted as part of the certificate holder's internal controls to the Board for approval.

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603a.13

(k) At the end of each gaming day or, in the alternative, at least once each gaming day, as designated by the certificate holder and approved by the Bureau of Gaming Operations, and at other times as may be necessary, a security department employee shall collect all envelopes or containers of used dice and reserve dice that are to be destroyed or cancelled and shall transport the dice to the security department for cancellation or destruction. The security department employee shall sign each envelope or container, or in the event the certificate holder elects to record the collection of such envelopes and containers on a summary list, the security department employee shall sign the summary. The security department employee shall also collect duplicate copies of Dice Discrepancy Reports, if any.

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(o) Destruction or cancellation of dice, other than those retained for Board or certificate holder inspection, shall be completed within 5 days of collection.

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(1) Cancellation must occur by drilling a circular hole of at least 1/4 inch in diameter through the center of the die; or.

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(2) Destruction must occur by shredding or crushing.

603a.15

(g) Each deck of cards shall be packaged separately or in a set containing the number of decks authorized in this subpart and selected by a certificate holder for use in a particular table game. Each package of cards shall be sealed in a manner approved by the Bureau of Gaming Operations to provide evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a set, the package must have a label that indicates or contain a window that reveals an adequate description of the contents of the package, including:

(1) The name of the certificate holder for which the cards were manufactured.

(2) The colors of the backs of the cards.

(3) The date that the cards were manufactured.

(4) The total number of cards in the set.

Deleted: (2) The game for which the cards are to be used.

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603a.16

(m) A certificate holder shall remove any deck of cards at any time during the day if there is any indication of tampering, flaws, scratches, marks or other defects that might affect the integrity or fairness of the game, or at the request of a surveillance department member, a casino compliance representative or other Board employee.

(o) At the end of each gaming day or, in the alternative, at least once each gaming day, as designated by the certificate holder in its internal controls, and at other times as may be necessary, a security department employee shall collect all envelopes or containers with damaged decks of cards, decks of cards required to be removed that gaming day, and all extra decks in the card reserve with broken seals and shall return the envelopes or containers to the security department. The security department employee shall sign each envelope or container, or in the event the certificate holder elects to record the collection of such envelopes and containers on a summary list, the security department employee shall sign the summary.

Deleted: and sign

(s) Decks of cards in an envelope or container that are inspected as required under subsection (q) and found to be without any indication of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play, with the exception of plastic cards used at Poker which are of sufficient quality for reuse, shall be destroyed or cancelled within 5 days of collection. Cards submitted to the Board shall be destroyed or cancelled within 5 days of release from the Board.

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(u) If a certificate holder elects to preinspect and reshuffle cards at a closed gaming table prior to the delivery of the cards to an open gaming table, the procedures in this subsection shall be performed by a dealer and supervised by a floorperson or above with no concurrent supervisory responsibility for open gaming tables. A schedule of the proposed time and location for the preinspection and reshuffling shall be provided to the casino compliance representatives at least 24 hours prior to commencement of the process. The procedures required under paragraphs (1)–(7) shall be recorded by the surveillance department and each recording shall be retained by the certificate holder for at least 7 days.

(1) - (5) No change

(6) Upon completion of the preinspection and reshuffling process of the cards in the batch, the dealer and floorperson or above shall complete a two-part Pre-shuffled/Preinspected Form or other documentation approved by the Bureau of Gaming Operations, which includes, at a minimum, the following:

(i) The time and date the Preshuffled/Preinspected Form was prepared.

(ii) The number of decks in the batch.

(iii) The signature of the dealer who preinspected and reshuffled the cards, certifying that the cards were preinspected and reshuffled in accordance with this subsection.

Deleted: (iii) The table games at which the cards will be utilized.†

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(iv) The signature of the floorperson or above who witnessed and verified the preinspection and reshuffling.

(v) The time, date and gaming table to which the sealed container of cards is subsequently delivered.

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(vi) The signature of the floorperson or above who delivered the sealed container of cards to the gaming table in accordance with paragraph (9).

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603a.17

(c) |

Comment: It should be at the certificate holder's discretion how and where the cover card is inserted into the stack.

603a.18

(k) At the end of each gaming day or at other times as may be necessary, a security department employee shall collect all envelopes or containers with damaged tiles, tiles used during the gaming day, and all extra tiles in the reserve which have been opened, and return the envelopes or containers to the security department. The security department employee shall sign each envelope or container, or in the event the certificate holder elects to record the collection of such envelopes and containers on a summary list, the security department employee shall sign the summary.

Deleted: For a dealing shoe used in Blackjack, the dealing shoe, in addition to meeting the requirements of subsection (b), must have a mark on the side of the shoe that enables the dealer, after aligning the stack of cards against the shoe in accordance with § 633a.6(e) (relating to shuffle and cut of the cards), to insert the cover card in the stack so that approximately one quarter of the stack is behind the cover card

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(p) Destruction or cancellation of tiles other than those retained for Board inspection, shall be completed within 5 days of collection. The method of destruction or cancellation shall be approved by the Bureau of Gaming Operations. The destruction or cancellation of tiles shall take place in a secure location in the licensed facility covered by the slot machine licensee's surveillance system, the physical characteristics of which shall be approved by the Bureau of Gaming Operations.

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Harrah's wishes to thank the Board for requesting input on these matters and hope our comments are helpful for your consideration. Should you require any additional information, please contact me at (484) 490-1754.

Sincerely,

Michelle Yarrow
Regulatory Compliance Manager
Harrah's Chester Casino and Racetrack

Cc: Silvan Lutkewitte, III, Chairman IRRC