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February 7, 2011

Susan Yocum
Director of Regulatory Review
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, Pennsylvania 17101-9060

Re: Public Comment on Table Game Equipment, Regulation No. 125-137

Dear Ms. Yocum:

Please accept the following comments to the proposed regulation referenced above on behalf of SugarHouse HSP Gaming, L.P. d/b/a SugarHouse Casino and Holdings Acquisition Co, L.P d/b/a Rivers Casino (collectively, "we").

Chapter 603a

As proposed, throughout Chapter 603a, certain actions must be performed by an Assistant Shift Manager or Pit Manager or above, as the case may be.

Comment: We suggest that references to "Assistant Shift Manager or above" be changed to "Pit Manager or above" and "Pit Manager or above" to "Floorperson or above." We believe that with these revisions, a high level of integrity will remain, but at the same time, it will provide the operators will more flexibility in terms of scheduling and carrying out the required functions. Each of these individuals is required to be licensed as a G2 and presumably goes through the identical investigative process.

Section 603a.5 Roulette chips; permitted uses, inventory and impressment.

Subsection (a), as proposed, provides that "[a] certificate holder or any employee thereof may not allow a patron to remove a Roulette chip from the Roulette table at which it was issued."

Comment: We believe that subsection (a) should be qualified to recognize that a certificate holder cannot guarantee that a roulette chip will not be removed from the roulette table from which it was issued by a patron. As such, we recommend the subsection (a) be modified as follows:

A certificate holder or any employee thereof may not knowingly allow a patron to remove a Roulette chip from the Roulette table at which it was issued.

We respectfully request that the Board consider the foregoing comments to Regulation No. 125-137. If you have any questions or require anything further, please let me know.

Very truly yours,

/s/ MICHAEL D. SKLAR

cc: IRRC
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Corey Plummer
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