



Eckert Seamans Cherin & Mellott, LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Mark S. Stewart
717.237.7191
mstewart@eckertseamans.com

February 7, 2011

VIA HAND-DELIVERY

Susan A. Yocum, Assistant Chief Counsel
Pennsylvania Gaming Control Board
Attn: Public Comment on Table Game Equipment, Regulation #125-137
303 Walnut Street, Strawberry Square
Verizon Tower, 5th Floor
P.O. Box 69060
Harrisburg, PA 17106-9060

Re: Comments to Proposed Rulemaking #125-137, Table Game Equipment

Dear Ms. Yocum:

The United States Playing Card Company (“USPC”), a conditional manufacturer licensee of table game devices with a principal place of business located at 300 Gap Way, Erlanger, Kentucky, respectfully submits these Comments in response to the Pennsylvania Gaming Control Board’s (the “Board”) Proposed Rulemaking No. 125-137 (“Rulemaking”) regarding table game equipment.

I. Introduction

USPC previously submitted comments and a supplement to the Board in response to Temporary Table Game Rulemaking No. 125-116 (table game equipment) raising various concerns including those involving dice dimensions and Poker cards. Specifically, USPC requested that the Board reduce the number of required card backings in the game of Poker from six to at least four or two. Upon review of the Rulemaking, USPC commends the Board for permitting slot machine licensees (who become certificate holders) to use cards with at least four visually distinguishable card backings rather than six. See 58 Pa. Code § 603a.15(j). This revision in the Rulemaking will reduce costs to slot machine licensees and ease the burden on table game equipment manufacturers. The revision is also in line with the regulatory trend in the majority of gaming jurisdictions.

II. Comments Specific to Dice Design

The physical characteristics of dice are set forth in Section 603a.12, which covers the permissible size range of an individual die. Subsection (a)(1) requires that each die used in table game play

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"[b]e formed in the shape of a perfect cube and of the size no smaller than 0.750 of an inch on each side nor any larger than 0.775 of an inch on each side." 58 Pa. Code § 603a.12(a)(1).

USPC agrees with the provision's size range, as the identified sizes are common in the industry. However, USPC urges the Board to clarify its regulation so as to allow for a tolerance of +/- .005 of an inch as to each end of the size range. Like virtually all production processes, the making of dice can be very precise, but still not be to an exact size each and every time a die is manufactured. Human and mechanical elements result in the potential for minor variances, or tolerances, on both the plus or minus side of any specified size.

Accordingly, in order to realize the full intent of the cited size range in Section 603.12(a)(1), a tolerance should be acknowledged in the regulation. Otherwise, operators will not be able to order and manufacturers will not be able to make a die at the size of 0.750 or 0.775 of an inch for fear that an otherwise acceptable and appropriate tolerance will render the die in violation of the regulation and unusable. USPC's proposed tolerance of +/- .005 of an inch is an accepted industry standard.

III. Conclusion

USPC thanks the Board for the opportunity to submit comments on Proposed Rulemaking No. 125-137 and for the Board's consideration of its comments. The above-mentioned comments are only submitted to provide clarification in the Pennsylvania gaming industry and allow the best production and regulatory compliance.

Very truly yours,



Mark S. Stewart

cc: Stephanie Krummert