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June 20, 2011

*Via E-mail and U.S. Mail*

Susan Yocum, Esquire  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
P.O. Box 69060  
Harrisburg, PA 17106-9060  
Attention: Public Comment on Regulation #125-145

Re: **Public Comment on Regulation #125-145**

Dear Ms. Yocum:

On behalf of Global Cash Access, Inc. ("GCA") and Western Money Systems ("WMS"), I write this letter to offer comments on the proposed Board Regulation 465a.9(e)(10). As you may know, Global Cash Access, Inc. is an approved Pennsylvania gaming service provider and the parent company for Western Money Systems, an approved Pennsylvania manufacturer.

GCA and WMS are uniquely situated to comment on proposed Board Regulation 465a.9(e)(10) because the two companies provide several Pennsylvania slot machine licensees with single- and multi-function kiosks described in the present version of that subsection ("automated bill breaker bill machines, automated gaming voucher and coupon redemption machines, automated jackpot machines and automated teller machines").

Presently, the kiosks provided by GCA and WMS to Pennsylvania slot machine licenses are not designed with the capability to record the face of the person transacting business at the kiosk. If the Board chooses to require GCA's and WMS's kiosks to record the patron's face, all of the kiosks at each licensed facility would have to be retrofitted to comply with the new requirement. That would require several steps: (i) purchasing the hardware to capture the image, (ii) re-designing the kiosks to include the new hardware, (iii) developing software to capture the image and transmit the image to the slot machine licensee's surveillance system, and (iv) installing and testing the hardware, software and integration with the slot machine licensee's surveillance system. The design of the retrofit will have to ensure that the integration with the slot machine licensee's surveillance system does not interfere with the bandwidth reserved for the business transacted at each kiosk.

Walking through the several steps is important for two practical considerations. First, retrofitting the kiosks to comply with the new requirement will take time. GCA and WMS estimate between 120-240 days and they request that the Board allow sufficient time so that slot machine licensees can comply. Second, GCA and WMS will incur an expense retrofitting the kiosks and that expense will be passed on to the licensees who bear the responsibility for complying with the Board's internal control regulations. GCA and WMS estimate that it the cost to retrofit each kiosk with the requisite

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new equipment would be \$750 per kiosk. Integration with the slot machine licensee's surveillance system will require significant additional expense varying based on the slot machine licensee's surveillance system. GCA and WMS ask that the Board consider these added expenses when it drafts the final version of Regulation #125-145.

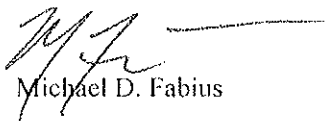
For a clearer understanding of the Board's intention, GCA and WMS also request clarification on two aspects of the new requirement. The Board's preamble to Regulation #125-145 explains that the new requirement applies to "ATM machines" but the text of the Regulation is not tailored as specifically because it uses the term "machine" and "machine" is not defined.. If the Board's intention is to apply this to just ATM machines, we suggest revising the second sentence of proposed Board Regulation 465a.9(e)(10) as "Coverage shall include a camera contained within the **automated teller machine** that records the face of each patron transacting business at the **automated teller machine**."

To provide additional comments and to better prepare for retrofitting the kiosks, it would be helpful to have additional background regarding the Board's objectives for requiring each slot machine licensee's surveillance system to record the face of each person transacting business at the machine.

- For example, is it intended to prevent fraudulent transactions at the automated teller machine or provide additional points of surveillance on the gaming floor? If it is intended to prevent fraudulent transactions, it may also be intended that the slot machine licensee connect the face captured by the camera in the kiosk to the transaction conducted at the kiosk. Such a requirement would increase the time and cost for retrofitting the kiosks because it would require the development of additional software provide that capability.
- Also, is it intended for the camera to capture a still photographic of each person transacting business at the machine or a continuous video feed? A continuous video feed would significantly increase the bandwidth requirements for transmission.

Thank you in advance for your consideration in your preparation of the final regulation. We understand the policy behind the new requirement but want to make sure to help the Board understand these practical considerations from the companies that provide the affected devices to slot machine licensees.

Sincerely,



Michael D. Fabius

MDMF/

cc: Kacy Drury, Vice President Compliance, Global Cash Access