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June 21, 2011

Via email

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

Re: Public Comment on Proposed Regulation No. 125-145

Dear Ms. Yocum:

Please accept the following comments to the proposed rulemaking 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").

I. Section 465a.7(a). Complimentary Services

The proposed regulation requires the submission of internal controls for complimentary services to the Board for approval. *"The slot machine licensee shall submit internal controls for complimentary services and items to the Board for approval under 465a.2 (relating to internal control systems and audit protocols)."*

Comment:

We respectfully submit that the internal control submissions should not specifically reference the Board. The majority of the revisions to the internal controls are submitted to the Bureau of Gaming Operations as opposed to the Gaming Board. We suggest that the above section be modified as follows: *"The slot machine licensee shall submit internal controls for complimentary services and items ~~to the Board for approval~~ as required under 465a.2 (relating to internal control systems and audit protocols)."*

II. Section 465a.9(e)(10). Surveillance System

The proposed regulation requires a camera be contained within automated bill breaker machines, automated gaming voucher and coupon redemption machines, automated jackpot payout machines and automated teller machines.

Comment:

The installation of cameras inside of each of these machines will be an extremely costly requirement and, in the case of ATMs and certain other machines, a very difficult proposition since the casino licensees do not own those machines. We submit that the existing surveillance coverage is more than adequate to cover the operations conducted at these machines.

III. Section 467a.1(d). Gaming Floor Plan

Subsection (d) requires petitions and requests for changes to the gaming floor to include certain minimum items.

- (1) *A narrative description of the proposed changes.*
- (2) *A revised gaming floor plan in accordance with this section.*
- (3) *A revised plan for the distribution and collection of slot cash storage boxes and table game drop boxes as required under § 465a.18(a) (relating to transportation of slot cash storage boxes and table game drop boxes to and from the gaming floor; storage).*
- (4) *The table game pit number or slot machine area and the proposed configuration of any table game pit or slot machine area affected.*
- (5) *The type, location and table number of any gaming table affected.*
- (6) *An updated slot machine master list as required under § 463a.5 (relating to slot machine master lists).*
- (7) *The proposed amendments to the standard or alternative staffing levels required under § 465a.35 (relating to personnel assigned to the operation and conduct of table games).*
- (8) *The proposed amendments to surveillance required under § 465a.9.*
- (9) *A timetable for the completion of the proposed changes.*

Comments:

A. Certain of the above requirements should not be required for the requests to the Executive Director. For example, submission of a revised gaming floor plan should not be required when the types of table games are changed or other minor gaming floor changes. In addition, certain requirements are often conditions of approval, e.g., filing of an updated slot machine master list.

It is respectfully suggested that a request for changes to the gaming floor submitted to the Executive Director only require items 1, 4, 5 and 9 and then such other information as the Board may request.

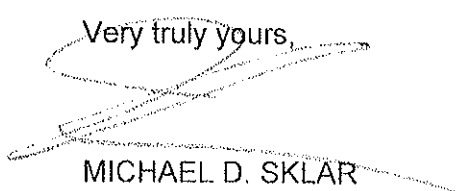
B. With respect to Petitions, we respectfully submit that the above requirements be modified as follows:

- (1) *A narrative description of the proposed changes.*
- (2) *A revised gaming floor plan in accordance with this section, as may be necessary.*
- (3) *A revised plan, if necessary, for the distribution and collection of slot cash storage boxes and table game drop boxes as required under § 465a.18(a) (relating to transportation of slot cash storage boxes and table game drop boxes to and from the gaming floor; storage).*
- (4) *The table game pit number or slot machine area and the proposed configuration of any table game pit or slot machine area affected.*
- (5) *The type, location and table number of any gaming table affected.*
- (6) *~~An updated slot machine master list as required under § 463a.5 (relating to slot machine master lists).~~ **[Should be required as a condition to any approval]***
- (7) *The proposed amendments, if any, to the standard or alternative staffing levels required under § 465a.35 (relating to personnel assigned to the operation and conduct of table games).*
- (8) *The proposed amendments, if any, to surveillance required under § 465a.9.*
- (9) *An estimated timetable for the completion of the proposed changes.*

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We respectfully request that the Board consider the foregoing comments to Regulation No. 125-145. If you have any questions or require anything further, please let me know.

Very truly yours,



MICHAEL D. SKLAR

cc: IRRC
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David Patent
Wendy Hamilton
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Rhonda Gilchrist
Lynette Lee