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July 8, 2011

**VIA E-MAIL & FEDERAL EXPRESS**

Susan A. Yocum  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
P.O. Box 69060  
Harrisburg, PA 17106-9060

**RE: Public Comment on Proposed Rulemaking # 125-149**

Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is the holder of a table games operation certificate and a Category 1 slot machine license, which authorize GGE to operate Parx Casino in Bensalem, Pennsylvania. GGE respectfully submits the following comments to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's proposed rulemaking, as captioned above, which was published in the Pennsylvania Bulletin at 41 Pa.B. 2981, on June 11, 2011.

The rulemaking at issue proposes to replace the temporary regulations for Pai Gow, Craps, Mini-Craps and Sic Bo. Specifically, the Board is replacing temporary regulation Chapter 535 with permanent regulation Chapter 621a, which would govern the rules of the game for Pai Gow. The Board is also replacing temporary regulation Chapter 537 with permanent regulation Chapter 623a, which would govern the rules of the game for Craps and Mini-Craps. Finally, the Board is replacing temporary regulation Chapter 539 with permanent regulation Chapter 625a, which would govern the rules of the game for Sic Bo.

GGE respectfully requests that the Board modify proposed regulation 58 Pa. Code § 621a.3(e) to allow licensees more time between the replacement of Pai Gow tiles from a gaming table. Currently, the proposed rulemaking requires licensees to change the Pai Gow tiles used for play at least once every 12 hours. See 58 Pa. Code § 621a.3(e) (*Proposed Rulemaking*, 41 Pa. B. 2981). GGE suggest increasing this time requirement from every 12 hours to every 24 hours. GGE believes this change would provide licensees with greater flexibility and cost savings without sacrificing any protections to the game.

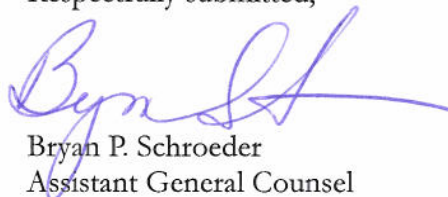
By increasing the time interval for replacing tiles from 12 hours to 24 hours, the rulemaking would allow licensees to change tiles once each gaming day—whether the game was played for 8

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hours, 12 hours or 18 hours. This would reduce the number of tile sets used by GGE. In fact, GGE could save as many as six (6) sets of tiles each day, which correlates to approximately \$720.00 per day and over \$20,000 per month. GGE raised similar concerns in its public comment letter, dated February 8, 2011, regarding Proposed Rulemaking #125-137, when GGE asked the Board to allow single replacement tiles so entire sets of tiles are not destroyed due to one (1) unsuitable tile. Finally, GGE sees no decrease in game or asset protection by increasing the time interval by 12 hours. GGE's Security Department will still thoroughly evaluate and review each set of tiles when they are collected at the end of each gaming day. Again, GGE respectfully request that the Board increase the time interval for replacing Pai Gow tiles from 12 hours to 24 hours.

Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,



Bryan P. Schroeder  
Assistant General Counsel  
Greenwood Gaming & Entertainment, Inc.

bps

cc: Silvan B. Lutkewitte, III, Chairman, Independent Regulatory Review Commission  
Thomas C. Bonner, Esq.