



HOLLYWOOD *Casino*
at PENN NATIONAL RACE COURSE

July 6, 2011

Sent via Certified Mail

Ms. Susan Yocum
Director of Regulatory Compliance
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
5th Floor Verizon Tower
Harrisburg, PA 17101

Re: Mountainview Thoroughbred Racing Association, d/b/a Hollywood Casino at Penn National Race Course, Comments on Proposed Rulemaking Regulation No. 125-149.

Dear Ms. Yocum;

Mountainview Thoroughbred Racing Association, d/b/a Hollywood Casino at Penn National Race Course ("HCPN"), respectfully offers these comments to the Pennsylvania Gaming Control Board's ("Board") Proposed Regulations No. 125-149. HCPN again thanks the Board for the opportunity to share our experience with the Board in the drafting of final table game regulations.

§ 623a.3. Permissible wagers (Craps).

The proposed regulation §623a.3(a)(42), relating to Lay Bets, states that "a Lay Bet shall be inactive on a come out roll unless called 'on' by the player and confirmed by the dealer through the placement of an 'on' marker button on top of the player's wager." HCPN proposes that this section be amended to state that Lay Bets are always active, even on a come out roll.

In the game of craps, the industry standard is that Lay Bets are always working, even on a come out roll. Players who wager on a Lay Bet are hoping for a seven to roll before the selected number, which means the player can win his Lay Bet even if the shooter rolls a "seven winner" on the come out roll. Pennsylvania craps players will be confused and frustrated if the default status of a Lay Bet is "off" on a come out roll, when players are accustomed to these bets automatically working. By making this change, the Board will be aligning the status of Lay Bets in Pennsylvania to match the industry norm.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Zee Zee', with a long horizontal flourish extending to the right.

Zachary Zarnoch
Compliance Manager

cc:

F. Quigley, Vice President/General Manager
S. Schalles, IRRC