



**HOLLYWOOD** *Casino*  
at PENN NATIONAL RACE COURSE

September 12, 2011

**Sent via Certified Mail**

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Ms. Susan Yocum  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
5<sup>th</sup> 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. 125-155.**

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. 125-155. HCPN thanks the Board for the opportunity to share our experience with the Board. In drafting final table game regulations, the Board should strive to create a regulatory framework which allows each operator sufficient flexibility to efficiently and profitably manage their operation. Based on this philosophy, HCPN offers the following comments and suggestions.

**§ 633a.8. Insurance Wager (Blackjack)**

The proposed regulation §633a.8(b) requires the player to actively place value chips on the insurance line in order to make an insurance wager. HCPN proposes this section be amended to include a provision allowing operators to offer "even money" in lieu of a player actively placing an insurance wager when the player's hand contains a two-card twenty one ("blackjack").

If the player is dealt a blackjack with a dealer exposed ace, there are two outcomes for a player who chooses to make an insurance wager: the dealer also has blackjack, in which case the player pushes on his main wager and wins his insurance wager, or the dealer does not have blackjack, in which case the player loses his insurance wager and is paid on his blackjack. However, both outcomes lead to identical aggregate results, with the player winning the exact amount of his original wager. For example, assume a player makes a \$10 wager and is dealt a blackjack with a dealer exposed ace, and decides to take full insurance of \$5. If the dealer has blackjack, the player will push on his \$10 blackjack wager, and will be paid 2 to 1 (\$10) on his insurance wager, for a net gain of \$10, which is the amount of his original wager. If the dealer does not have blackjack, the player will lose the \$5 insurance wager, and be paid 3 to 2 (\$15) on his blackjack wager, for a net gain of \$10, which is also the amount of his original wager.

As demonstrated, once a player is dealt blackjack and decides to take insurance, he will always end up with a net gain equal to his original wager. As such, it is both more efficient and more customer friendly to allow an operator to offer even money. With such a procedure, when a player is dealt a blackjack with a dealer exposed ace, the player can simply request even money, in which case the dealer pays the original wager even money and collects the cards. With the current procedure, the player would be required to actively place an insurance wager on the insurance line. Depending on the amount of the original wager, this may also necessitate a dealer performing a cheque-change transaction in order to facilitate the correct amount of chips, which can further slow the process. In addition, a player who is down to his last wager may not be able to afford to place an insurance wager, whereas he would be able to request even money, which does not require an additional wager.

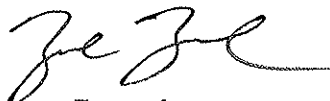
**§645a.3(c)(2). Cards; number of decks (Pai Gow Poker)**

The proposed regulation §645a.3(c)(2) requires cards dealt from an automatic dealing shoe to be changed at least every eight hours. As such, on a game which remains open for a continuous 24-hour period, an operator is required to use three sets of cards. HCPN proposes that this section be amended to state that cards dealt from an automatic dealing shoe be changed at least every twelve hours. Under this proposal, a game which remains open for a continuous 24-hour period would only require 2 sets of cards.

Changing sets of cards is a valuable tool used to help prevent cheating, as it guarantees that “marked” cards are removed from play at a determined interval. However, the actual process of changing cards can take several minutes. During this time, the game is halted and the casino, and by extension the Commonwealth, is not generating any revenue. HCPN dealers and supervisory staff are trained to continually check for marks or other damage to cards on these games. If any abnormalities are found, the cards are immediately replaced. By increasing the duration of use from eight hours to twelve hours, the Board will still be protecting the integrity of the cards, while decreasing player inconvenience and increasing revenue generation.

Again, HCPN thanks the Board for the chance to share our input into this process. HCPN views table games as an extraordinary opportunity to maximize tax revenue collection for the Commonwealth. In order to do so, HCPN urges to Board to use this opportunity to create a flexible regulatory framework for the operators, allowing each operator to efficiently and effectively generate additional revenue for themselves and the Commonwealth.

Sincerely yours,



Zachary Zarnoch  
Compliance Manager

cc:

- F. Quigley, Vice President/General Manager
- M. Totino, IRRC