

HOLLYWOOD Casino®

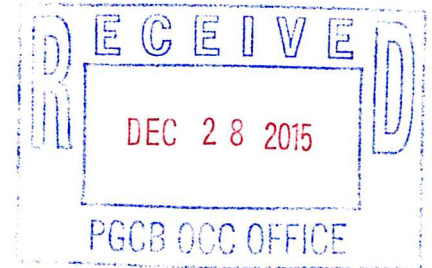
— AT PENN NATIONAL RACE COURSE —

777 Hollywood Blvd ★ Grantville, PA 17028

December 22, 2015

VIA CERTIFIED MAIL

Susan A. Yocum, Assistant Chief Counsel
Attn: Regulation #125-192 Public Comment
PENNSYLVANIA GAMING CONTROL BOARD
P.O. Box 69060
Harrisburg, PA 17106-9060



Re: Comments of Mountainview Thoroughbred Racing Association, d/b/a Hollywood Casino at Penn National Race Course, on Proposed Rulemaking No. 125-192

Dear Ms. Yocum:

Mountainview Thoroughbred Racing Association, d/b/a Hollywood Casino at Penn National Race Course ("HCPN"), respectfully offers these, admittedly tardy, comments to the Pennsylvania Gaming Control Board's ("Board") Proposed Rulemaking No. 125-192. Essentially, HCPN submits that Heads Up Hold'Em ("HUH") should be dealt in the same manner as Ultimate Texas Hold'Em ("UTH"), 58 Pa. Code §653a.1 *et seq.*, in order to achieve the goals of game protection, player experience, and dealer training. HCPN demonstrated its proposed changes to representatives of the Board's Bureau of Gaming Operations during an on-site visit on December 16, 2015.

HCPN proposes that §677a.9(c), §677a.10(c), §677a.11(c), and §677a.11(e) be amended as follows to track the language of the corresponding regulation in §653a:

- §677a.9(c): "After the two cards have been dealt to each player and to the area designated for the placement of the dealer's hand, the dealer shall deal the five community cards in accordance with §677a.11 (relating to procedures for completion of each round of play). After all community cards have been dealt, the dealer shall, except as provided in subsection (d), place the stub in the discard rack without exposing the cards."
- §677a.10(c): "After each stack of two cards has been dispensed and delivered in accordance with subsection (b), the dealer shall remove the remaining cards from the automated dealing shoe and, following the procedures in §677a.9(a)(2) (relating to procedure for dealing the cards from the hand), deal from his hand the five community cards in accordance with §677a.11 (relating to procedures for completion of each round

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of play). After all five community cards have been dealt, the dealer shall, except as provided in subsection (d), place the stub in the discard rack without exposing the cards."

- §677a.11(c): "After each player has either placed a Raise Wager or check, the dealer shall burn the next card. The dealer shall then deal the Flop face up to the designated area for the community cards."
- §677a.11(e): "Once all players have either placed a Raise Wager or checked, the dealer shall burn the next card. The dealer shall then deal the Turn and River cards face up on the layout in the designated area for the community cards."

The difference between the language in Proposed Rulemaking No. 125-192 and HCPN's proposal, based on UTH, is the manner in which the five (5) community cards are dealt. The language in Proposed Rulemaking No. 125-192 indicates that all five (5) community cards must be dealt to the board *prior* to players making any additional bets. If cards are marked, players have the maximum amount of information before having to make any bets. Conversely, the UTH regulation states that *after* players make their bets, the dealer burns the next card and then deals the Flop. 58 Pa. Code §653a.11(c). The UTH regulation also states that *after* players make their next round of bets, the dealer burns the next card and then deals the Turn and River cards. *Id.* at §653a.11(e). This pattern of betting and dealing calls for cards to be dealt only when they are needed and includes the added protection of a burn card. Accordingly, HCPN submits that the UTH procedures for dealing cards provide stronger game protection and should likewise be employed in HUH.

Additionally, HCPN believes that dealing HUH in the same pattern as UTH will provide players with a more familiar experience and, therefore, increase adoption of this new game. HCPN is excited to be able to offer HUH to its guests and wants to provide a game they can quickly and easily grasp and enjoy. To that same end, dealing HUH in the same pattern as UTH will shield dealers from having to learn and implement a new and previously unused method for delivering cards and, therefore, allow for a quicker-paced game. Finally, from a personnel standpoint if UTH and HUH use the same pattern of dealing, it will allow for a smoother transition for dealers required to act as a relief between the two games.

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HCPN thanks the Board for the opportunity to submit these comments. Should the Board have any questions, please do not hesitate to contact me.

Very truly yours,



Alex M. Hvizda

Compliance Manager

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cc Paul Resch, Director of Gaming Operations (via email only)
Patty Gustavson, Compliance Manager (via email only)
Debra Pfaff, Compliance Examiner (via email only)
Trevor Hassenbein, Casino Compliance Supervisor (via email only)

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