

Comments of the Independent Regulatory Review Commission



Pennsylvania Gaming Control Board Regulation #125-195 (IRRC #3124)

Three Card Prime; Table Game Rules of Play

February 10, 2016

We submit for your consideration the following comments on the proposed rulemaking published in the December 12, 2015 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a)) directs the Pennsylvania Gaming Control Board (Board) to respond to all comments received from us or any other source.

1. Section 679a.2. Three Card Prime table physical characteristics. – Clarity.

This section details the table physical characteristics for the new game called Three Card Prime. Subsection (b)(2) requires that the layout for a Three Card Prime table contain, at a minimum, three separate betting areas designated for the placement of Ante and Play Wagers for each player. Since each player makes one Ante Wager and one Play Wager, should there be two betting areas instead of three? The Board should revise the regulation to specify two betting areas or explain why three betting areas are necessary.

2. Section 679a.12. Payout odds; Envy Bonus; rate of progression. – Clarity.

Subsection (c) refers to “Bad Beat Bonus.” The Board should define “Bad Beat Bonus” and include it in the final rulemaking. We also recommend the Board revise the title of the section to reference “Bad Beat Bonus” instead of “Envy bonus.”