

**Comments of the Independent Regulatory Review Commission****Pennsylvania Gaming Control Board Regulation #125-218 (IRRC #3213)****Down Under Blackjack; Table Game Rules of Play****November 21, 2018**

We submit for your consideration the following comments on the proposed rulemaking published in the September 22, 2018 *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.

**Clarity.**

We have identified three minor clarity concerns with this proposed rulemaking. First, the definitions listed in § 685a.1 (relating to definitions) should be listed in alphabetical order. Second, § 685a.3 (relating to cards; number of decks; value of cards) contains two subsections cited as d. (Emphasis added.) The second subsection should be amended to e. Third, § 685a.4(e) (relating to the opening of the table for gaming) states that Subsections (a) and (c) – (e) do not apply if the deck of cards received at the table are preinspected and reshuffled. The reference to Subsections (a) and (c) – (e) should be amended to read Subsections (a) – (d). This would be consistent with other regulations of the Board governing different Blackjack games.