



# PhiladelphiaPark

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**By Hand**

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Paul Resch, Secretary  
Pennsylvania Gaming Control Board  
P.O. Box 69060  
Harrisburg, PA 17106-9060  
Attn: Public Comment on Regulation No. 125-79

Re: **Comments to Proposed Regulations 58 Pa.C.S. §§ 461a and 465a**

Dear Mr. Resch:

Greenwood Gaming and Entertainment, Inc. ("GGE") respectfully requests the Pennsylvania Gaming Control Board (the "Board") to consider the following comments to the above referenced proposed regulations:

1. **Section 465a.26 Jackpot Payouts.**

Proposed regulation 465a.26 causes the most concern to GGE in that the proposed changes will require significant modifications to the procedures and personnel currently utilized for jackpot payouts. GGE requests an opportunity to meet with the Board in order to more fully explain its concerns regarding these changes. GGE has some general comments and I have enclosed a "blackline" copy of the proposed regulation with suggested changes.

The proposed regulations should allow for flexibility in the way GGE assigns duties and responsibilities to various staff and departments. For instance, the proposed regulations refer to "lead" slot attendants. GGE does not designate "lead" slot attendants and it is a position not currently in its jobs compendium. GGE sees no valid regulatory reason why these duties cannot be performed by slot attendants. Similarly, functions designated to be performed by a specific position should include the designation "or above" to allow those personnel who supervise or manage departments to perform the designated duties.

Sections 465a.26(b) and (c) are identical but use different forms and personnel requirements that appear to contradict each other. The unique portions of Section

465a.26(c) could be merged with Section 465a.26(b) in order to eliminate any confusion.

It is suggested that Sections 465a.26(c)(15) through (22) be omitted and replaced with "Each slot licensee shall establish a comprehensive system of Internal Controls addressing a method of manual jackpot payouts in the event of system outages."

The purpose of a two-part manual Jackpot Receipt is unclear and the form currently utilized by GGE will not comply with the proposed regulations.

In proposed Section 465a.26(b)(9)(iii) GGE recommends that the winning combination of the jackpot should be checked at the time when the jackpot is won, instead of at the time of payment. Additionally, only a Slot Shift Manager should be required to be present at time of payment.

In all instances where the combination of characters on a slot machine is mentioned, an allowance should be made for a code corresponding to the winning combination of characters.

Proposed Section 465a.26(b)(5) should allow receipts for unclaimed jackpots to be prepared by a slot cashier.

Proposed Section 465a.26(b)(6)(ii) should allow the licensee to use its discretion when accepting valid identification when a patron has lost the duplicate copy of the Jackpot Payout Receipt.

Proposed Section 465a.(b)(9)(vi) should allow documents related to jackpots to be forwarded to a satellite bank as well as the main bank for reimbursement at the end of the gaming day.

## **2. Section 461a.1 Definitions.**

Proposed regulation 58 Pa.C.S. § 461a.1 expands the definition of "Asset number" to include "associated equipment".

GGE respectfully submits that the proposed definition is extremely broad. We request that the Board provide clarification regarding what would constitute "associated equipment". Without further guidance it would be difficult for GGE to comply with this modification as written. If the Board feels a modification is required, GGE would suggest that the definition be changed to include gaming related equipment only along with a definition of that term.

3. **Section 461a.7 Slot machine minimum design standards.**

Proposed regulation 58 Pa.C.S. § 461a.7 requires labels on slot machines containing the asset number, gaming floor location, and contains detailed requirements regarding the size, color, location, etc. of the label.

GGE does not object to the general requirement of a label on the unit that is able to be read by the Surveillance Department. However, GGE does object to additional specifications contained in the proposed regulation. The issue of size, color and location and information contained on the label becomes an issue with varying machine models, laminates and the aesthetics of each particular machine. GGE currently maintains labels on all of its machines. The cost to produce new labels and remove the existing labels would be approximately \$9,000.00 and it is unclear what additional benefit would be achieved by the proposed regulation.

4. **Section 461a.10 Automated gaming voucher and coupon redemption machines.**

**Section 461a.22 Automated jackpot payout machines.**

Proposed regulation 58 Pa.C.S. § 461a.10 and 22 require the same labels on automated gaming voucher, coupon redemption and automated jackpot payout machines as proposed in 58 Pa.C.S. § 461a.7. As stated in paragraph 2, GGE does not object to the general requirement of a label on these units. In fact, all ticket redemption machines currently have labels. However, the existing labels would not conform with the proposed specifications and would require replacement at significant cost with no clear additional benefit. GGE does not currently use automated jackpot machines. However, in anticipation of those units, GGE advances the same objections as raised above. GGE would label the units but the size, location, color, etc. should be left to GGE management so long as the labels can be read by the Surveillance Department.

Thank you for considering the comments of GGE to the proposed regulations.

Very truly yours,



Karen M. Wosnack  
Assistant General Counsel

**§ 465a.26. Jackpot payouts. Proposed Changes**

(b) [The internal control procedures developed and implemented by the slot machine licensee under subsection (a) must include:

(1) A request for jackpot payout document or, in the alternative, an electronic entry into a slot computer system generating jackpot payouts, by a slot attendant or above, evidencing the observation by the slot attendant or above of the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and a determination of the amount of the jackpot payout based on the observed winning combinations.

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(2) A requirement that the preparer of the request for jackpot payout document or, in the alternative, the employee performing the electronic entry into the slot computer system, be a slot supervisor or above if the hand paid jackpot is \$10,000 or more.

(3) A requirement that the following information be on the request for jackpot payout document or electronically entered into the slot computer system and maintained in stored data:

(i) The date and time of the jackpot.

(ii) The asset number of the slot machine on which the jackpot was registered.

(iii) The winning combination of characters constituting the jackpot or a code corresponding to the winning combination of characters constituting the jackpot.

(iv) The amount of the jackpot payout.

(v) The method of payment requested by the patron.

(vi) The signature or identification code of the preparer.

(vii) The following additional signatures or identification codes shall be required if the slot machine or the progressive meter is reset prior to the patron being paid or if payment is made directly to the patron by a slot cashier or above:

(A) The signature or identification code of a security department member or slot attendant or above other than the preparer attesting to the winning combination of characters or code corresponding to the winning combination of characters constituting the jackpot and the amount of the jackpot payout.

(B) The signature or identification code of the slot shift manager attesting to the winning combination of characters or code corresponding to the winning combination of characters constituting the jackpot and the

amount of the jackpot payout when the jackpot amount is \$25,000 or more.

(4) A requirement that following preparation the request for jackpot payout document be immediately transported by the preparer, or the information made available by the slot computer system, to the cashiers' cage where it will serve to authorize the preparation of a jackpot payout document.

(5) A requirement that if the winning patron will not be paid before the slot machine or progressive meter is reset, a slot cashier or above shall also prepare a two-part receipt document containing the following information:

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- (i) The date and time of the jackpot.
- (ii) The asset number of the slot machine on which the jackpot was registered.
- (iii) The winning combination of characters constituting the jackpot or a code corresponding to the winning combination of characters constituting the jackpot.
- (iv) The amount of the jackpot payout.
- (v) The signature of the winning patron on the original form only.
- (vi) The signature of the preparer attesting that the information on the receipt document is correct and agrees with the information on the request for jackpot payout document or in stored data.

(6) A requirement that the receipt document be distributed as follows:

(i) The original shall be immediately delivered to the slot cashier or above by the preparer, security department member or verifying slot attendant or above along with the request for jackpot payout document if manually generated in accordance with paragraph (1).

(ii) The duplicate shall be immediately presented to the winning patron who shall be required to present the duplicate receipt document or valid I.D. before being paid the jackpot in accordance with the procedures set forth in this section.

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(7) A requirement that the following information be on any jackpot payout document generated by the slot computer system:

- (i) The asset number of the slot machine on which the jackpot was registered.
- (ii) The winning combination of characters constituting the jackpot or a code corresponding to the winning combination of characters constituting the jackpot.

(iii) The date on which the jackpot occurred.

(iv) The amount that is to be paid from cashiers' cage funds. However, this amount may, in the slot machine licensee's discretion, be rounded up to the nearest whole dollar.

(v) The date, time and method of payment.

(vi) The signature or identification code of the preparer.

(8) A requirement that the data in paragraph (7)(i)-(vi) not be susceptible to change or removal by any personnel after preparation of a jackpot payout document.

(9) A requirement that whenever the winning patron is paid directly by the slot cashier or above the following procedures be followed:

(i) A jackpot payout document be generated by the slot computer system in accordance with paragraph (7).

(ii) If a one-part request for jackpot payout document is involved and a security department member or verifying slot attendant or above other than the preparer has not signed the one-part request for jackpot payout document, the slot cashier or above shall summon a security department member or slot attendant or above other than the preparer of the request for jackpot payout document and provide that employee with the request for jackpot payout document. The security department member or verifying slot attendant or above shall proceed to the slot machine identified on the request for jackpot payout document and sign the request for jackpot payout document attesting that the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the request for jackpot payout document. If the jackpot amount is \$25,000 or more, a slot shift manager or above shall also sign the request for jackpot payout document attesting that the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the request for jackpot payout document. The request for jackpot payout document shall be immediately returned to the slot cashier or above.

(iii) After the slot cashier or above determines that the required signatures verifying the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid have been placed on the one-part request for jackpot payout document, if the amount being paid is less than \$10,000, the slot cashier or above shall pay the winning patron in the presence of the preparer of the request for jackpot payout document. If the amount being paid is \$10,000 or more but less than \$25,000, the slot cashier or above shall pay the winning patron in the presence of the slot

attendant supervisor who prepared the request for jackpot payout document. If the amount being paid by the cashier is \$25,000 or more, the slot cashier shall pay the winning patron in the presence of the slot attendant and a slot shift manager or above in accordance with this subsection. Personnel required by this subsection to witness the payment shall sign the duplicate jackpot payout document attesting to the accuracy of the information on the duplicate jackpot payout document and the disbursement of the payment to the patron.

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(iv) If a receipt document under paragraph (5) was issued, the duplicate receipt document shall be signed by the patron in the presence of the slot cashier or above. The slot cashier or above shall compare the signature on the duplicate receipt document to that on the original receipt document and make the payment only if the signatures are in agreement.

(v) Once the required signatures are obtained and payment has been made, the slot cashier or above shall give the duplicate jackpot payout document to a security department member or slot attendant or above who shall expeditiously deposit it into a locked accounting box.

(vi) The slot cashier or above shall attach the request for jackpot payout document, if applicable, the original and duplicate receipt document, if applicable, to the original copy of the jackpot payout document. All documents shall be forwarded by the end of the gaming day to the main bank or satellite bank for reimbursement.

(10) A requirement that whenever a winning patron is paid by a slot attendant or above, the following procedures shall be followed:

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(i) A jackpot payout document be generated by the slot computer system in accordance with paragraph (7).

(ii) The slot cashier or above shall disburse the cash or slot licensee check to a slot attendant or above if the amount of the jackpot is less than \$10,000 and to a slot attendant supervisor or above if the amount of the jackpot is \$10,000 or more. The employee receiving the payment shall verify the amount received and sign the original and duplicate of the jackpot payout document attesting to the accuracy of the information on the jackpot payout document and the receipt of the payment from the slot cashier or above. The slot cashier or above shall retain the original jackpot payout document and the duplicate jackpot payout document shall be transported with the payment to the slot machine.

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(iii) If a one-part request for jackpot payout document is involved and a security department member or verifying slot attendant or above other than the preparer has not signed the one-part request for jackpot payout document, the slot attendant or above shall provide the duplicate jackpot payout document to the security department member or verifying slot attendant or above other than the

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preparer at the slot machine who shall verify that the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the duplicate jackpot payout document. If the jackpot amount is \$25,000 or more, and the slot shift manager or above has not signed the request document, the slot shift manager shall similarly verify that the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the duplicate jackpot payout document.

(iv) When the verifications required by subparagraph (iii) have been completed, if the payment is less than \$10,000, the slot attendant or above shall pay the winning patron in the presence of the security department member or second slot attendant or above who verified the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid. If the payment is \$10,000 or more, but less than \$25,000, the payment shall be made by a slot attendant supervisor or above in the presence of the security department member or verifying slot attendant or above who verified the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid. If the payment is \$25,000 or more, the payment shall be made by a slot attendant supervisor or above in the presence of the security department member or verifying slot attendant or above and the slot shift manager or above who verified the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid. Once the patron has been paid, the personnel required by subparagraph (iii) to witness the payment shall sign the duplicate jackpot payout document attesting that the winning combination of characters or code corresponding to the winning combination of characters on the slot machine and the amount to be paid match those which appear on the duplicate jackpot payout document and the disbursement of the payment to the winning patron.

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(v) If a receipt document under paragraph (5) was issued, the slot cashier or above shall present the original receipt document along with the jackpot payout document. The patron shall be required to sign the duplicate receipt document in the presence of the slot cashier or above who shall compare the signature on the duplicate receipt document or ID, to that on the original receipt document and shall make the payment only if the signatures are in agreement.

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(vi) When payment has been made and the required signatures obtained, the security department member or slot attendant shall expeditiously deposit the duplicate jackpot payout document into a locked accounting box.

(vii) The slot attendant or slot attendant supervisor shall immediately return the original and duplicate receipt document, if applicable, to the cashiers' cage.



(viii) The slot cashier shall attach the request for jackpot payout document, if applicable, the original and duplicate receipt document, if applicable, to the original copy of the jackpot payout document. All documents shall be forwarded by the end of the gaming day to the main bank for reimbursement.

(11) A requirement that the slot machine licensee's accounting department perform, at the conclusion of each gaming day, income control audit procedures over the issuance of jackpot payouts including adequate comparisons to gaming voucher system data.

(12) Details with regard to processing of system overrides or adjustments.