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April 7, 2008

Via Federal Express and Via Email

Paul Resch, Secretary
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060
Attention: Public Comment on Regulation #125-79

Re: IGT Comments on Pennsylvania Gaming Control Board Regulation #125-79

Dear Mr. Resch:

On behalf of International Game Technology ("IGT") and its subsidiaries, we would like to thank the Pennsylvania Gaming Control Board (the "Board") for the opportunity to comment on the proposed rules published in the March 8, 2008 *Pennsylvania Bulletin* and respectfully request the Board take into account the following suggestions.

§461a.7(x) requires a slot machine to have a "service button designed to allow the player of a slot machine to request assistance." Certain electronic table games do not have a service or change button because these electronic table games are designed to be played only with an attendant present. IGT recommends the proposed language be modified to state, "*A slot machine that does not require a full-time attendant for operation must be equipped...*".

§465a.2(j) The amended language reads "A paper copy of the two attestations required under subsection (b)(1) and (2) shall also be maintained for a minimum of 5 years" IGT requests more flexibility so that electronically saved copies would also be acceptable.

465.a.28 (4)(k) Slot machines which are linked to offer the same merchandise jackpot must have the same probability of winning that jackpot. IGT requests the Board amend this section to allow for flexibility in game offerings that add to player excitement. IGT recommends the following proposed language:

Slot machines which are linked to offer the same merchandise jackpot shall:

1. All require the same maximum wager; or

International Game Technology

Regulatory Compliance
1085 Palms Airport Drive
Las Vegas, NV 89119-3749
702-896-8997 Fax 361-8643
www.IGT.com

2. If requiring different maximum wagers, utilize the expected value of winning the merchandise by setting the odds of winning the merchandise in proportion to the amount wagered. The method of equalizing the expected value shall be conspicuously displayed on each device connected to the system.

Thank you for your consideration in this matter. Should you have any questions, please feel free to contact me at (702) 896-8597.

Sincerely,

A handwritten signature in black ink that reads "Gayle Bauer". The signature is written in a cursive style with a large, looping initial "G".

Gayle Bauer
Regulatory Compliance Manager

GB:PAB:pab

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