LAW OFFICES

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

1735 MARKET STREET, 51st FLOOR
PHILADELPHIA, PENNSYLVANIA 19103-7599
215-665-8500
FAX: 215-864-8999

WWW.BALLARDSPAHR.COM

ADRIAN R. KING, JR.
DIRECT DIAL: 215-864-8622
PERSONAL FAX: 215-864-9971
KINGA@BALLARDSPAHR.COM

RECEIVED

MAR 3 1 2008

BALTIMORE, MD
BETHESDA, MD
DENVER, CO
LAS VEGAS, NV
LOS ANGELES, CA
PHOENIX, AZ
SALT LAKE CITY, UT
VOORHEES, NJ
WASHINGTON, DC
WILMINGTON, DE

March 26, 2008

VIA FIRST CLASS MAIL

Paul Resch, Secretary PA Gaming Control Board P.O. Box 69060 Harrisburg, PA 17106-9060

Attn: Public Comment on Regulation No. 125-82

Dear Mr. Resch:

The purpose of this letter is to request that the Pennsylvania Gaming Control Board (the "Board") consider setting a different standard for Category 3 slot machine licensees under proposed Regulation 441a.24.

We observe that the requirements of the proposed rule are extremely detailed and possibly burdensome for slot machine licensees to implement. In addition, in the Board's Notice of Proposed Rule Making, subsection entitled "Private Sector", the Board indicates that the annual cost of establishing and maintaining an independent audit committee is approximately \$250,000.

While the proposed rule may be appropriate for Category 1 or Category 2 slot machine licensees with the gaming revenues attendant to 3,000 or more positions, we respectfully submit that the proposed rule is unwarranted for Category 3 slot machine licensees who are limited to no more than 500 positions. The operation of slot machines at a well established resort is ancillary to the primary business of the resort.

Given the limited scope of Category 3 slot machine operations, we request that proposed Regulation 441a.24 not be applicable to Category 3 licensees but that the Chief Executive Officer and Chief Financial Officer of the Category 3 licensee, in concert with the

Paul Resch, Secretary March 26, 2008 Page 2

licensee's annual audit, be required to submit a statement, under oath, that the Category 3 licensee is complying with Chapter 465a of the Regulations.

Thank you very much for your courtesy and consideration with respect to this matter.

Very truly yours,

C P King (r)

ARK/er