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★ March 16, 2009 ★

HARRAH'S  
CHESTER CASINO  
& RACETRACK

777  
Harrah's  
Boulevard  
  
Chester,  
Pennsylvania  
19013

TEL  
800  
480  
8020

Richard Sandusky  
Director of Regulatory Review  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
5<sup>th</sup> Floor, Verizon Tower  
Harrisburg, PA 17101

Re: **Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino & Racetrack  
Comments on Proposed Rulemaking Regulation No. 125-97**

Dear Mr. Sandusky:

On behalf of Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack ("Harrah's"), respectfully submits these comments to the Pennsylvania Gaming Control Board ("Board") proposed regulations 58 Pa Code §437a.9, regarding permission to conduct business prior to certification or registration. Harrah's would like to thank the Board for the opportunity to comment on the proposed rules and respectfully requests the Board take into consideration the following suggestions.

58 Pa. Code §437a.9 (b) & (c)

Proposed regulation 58 Pa. Code §437a.9 (b) through (c) gives the Board's Office of Enforcement Counsel ("OEC") the authority to issue to an applicant for vendor certification or registration authorized to conduct business with a slot machine applicant or licensee a "Notice of Recommendation for Denial" which would effectively cause the vendor certification or registration applicant to immediately cease conducting business with a slot machine licensee or applicant.

Please take into consideration that many products and services for Harrah's are procured through vendors with specialized knowledge, and/or parts, that are distinctive to our gaming floor. An unexpected "stoppage" of such services for noted vendors may cause a considerable impact to revenue and other operational objectives.



Secondly, many slot machine licensees place orders with vendors on standard blanket orders. Blanket ordering makes purchasing frequent, small-dollar items more convenient for various facility entities. Typically, blanket orders are issued to local suppliers to cover frequent and sporadic purchases for major items such as bread, milk, and other items that are needed immediately. Because these items represent perishable commodities, it is imperative that quantities are set up for usage over a coordinated period of time, which means items must be bought, received, and used timely to meet business needs. As drafted, the “immediate” language used in proposal sections §437a.9 (b) and (c), if implemented would create a considerable disruption to goods and services that are pending and cause an undue burden on slot machine licensees to hurriedly source for Board approved vendors that can provide alternative products or services.

Therefore, Harrah’s respectfully requests that when the Board’s Office of Enforcement Counsel (OEC) intends to issue a Notice of Recommendation for Denial to propose a vendor certification or registration applicant license denial that slot machine licensees be allowed to continue to utilize noted vendors for a conditional period of thirty days or longer to provide such vendors time to take corrective action to avoid license denial, and as a contingency, allow slot machine licensees to start preparing for alternative sources if necessary.

We thank the Board for requesting input on these matters and hope our comments are helpful for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Curtis Lane Jr.", written in a cursive style.

Curtis Lane Jr.  
Regulatory Compliance Manager  
Harrah’s Chester Casino and Racetrack