



April 13, 2010



Richard Sandusky

HARRAH'S  
CHESTER CASINO  
& RACETRACK

Director of Regulatory Review

Pennsylvania Gaming Control Board

777  
Harrah's  
Boulevard

303 Walnut Street, Strawberry Square

5<sup>th</sup> Floor, Verizon Tower

Chester,  
Pennsylvania  
19013

Harrisburg, PA 17101

Re: **Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack**  
**Comments on Proposed Rulemaking Regulation No. 125-112**

TEL  
800  
480  
8020

Dear Mr. Sandusky:

On behalf of Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack ("Harrah's"), Harrah's respectfully submits these comments to the Pennsylvania Gaming Control Board's ("Board") Temporary Table Game Rulemaking No. 125-112. Harrah's would like to thank the Board for the opportunity to comment and share gaming industry best practices toward the Board's temporary rules, and respectfully requests the Board take into consideration the following suggestions.

**I. COMMENTS FOR PROPOSED RULEMAKING NO. 125-112**

**§553.3. (b) – Cards number of decks**

The Board's temporary regulations at §553.3 (b) specify each opened deck of cards at poker tables shall be rotated in and out of play and changed at least every six (6) hours.

Poker players typically engage in several rounds of poker play which can run for several hours. Harrah's believes that changing card decks too frequently would significantly break the



continuity of the game play dynamic for poker players. A poker card rotation and deck change of every eight (8) hours or at the close of each shift is highly suggested.

§553.8 (b)(5) - Wagers.

In section §553.8 (b) (5), it is noted that whenever a player indicates an intent to temporarily leave a Poker table during a round of play without relinquishing his seat at the table, a floorperson or higher shall verify the amount of the player's table stakes and maintain the player's table stakes on the table surface using a non-transparent cover until the player's return.

As the dealer serves as the "controller and facilitator" of all poker player activity at the poker table, Harrah's believes it should remain the responsibility of the dealer to monitor the player's table stakes remaining on the table, as is, and without the use of a non-transparent cover. If it is determined that the player has relinquished their seat for an extended period of time, that player's table stakes would be captured by Surveillance, verified by the dealer and table games shift manager, and secured in a transparent container until the player has returned to the table.

Harrah's wishes to thank the Board for requesting input on these matters and hope our comments are helpful for your consideration.

Sincerely,



Curtis Lane Jr.

Regulatory Compliance Manager

Harrah's Chester Casino and Racetrack