

April 16, 2010

Richard Sandusky, Director of Regulatory Review
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, Pennsylvania 17106-9060
Attention: Public Comment on Regulation #125-113

Dear Mr. Sandusky:

Thank you for allowing Shuffle Master, Inc. ("Shuffle Master") the opportunity to comment on the Temporary Table Games Regulations adopted by the Pennsylvania Gaming Control Board. After our review, we would like to provide the following comments:

CHAPTER 535. PAI GOW

- § 535.2. Pai Gow table; Pai Gow shaker; physical characteristics.

Part (d) of this section only mentions the use of a Pai Gow shaker, used to shake three dice before each hand of Pai Gow is dealt to determine the starting position for the dealing of the Pai Gow tiles. If a specialty shuffler is used with Pai Gow, an electronic display can be utilized to determine the starting position by means of a random number generator.

Shuffle Master recommends that the requirement be changed to "Pai Gow shall be played with a Pai Gow shaker or an electronic display that utilizes a random number generator, approved by the Bureau of Gaming Operations. A Pai Gow shaker shall shake three dice, or in the alternative, an electronic display that utilizes a random number generator shall be used before each hand of Pai Gow is dealt to determine the starting position for dealing of the Pai Gow tiles."

- § 535.5. Dice; number of dice; Pai Gow shaker.

Part (a) of this section only mentions the use of a dice. If a specialty shuffler is used with Pai Gow an electronic display can be utilized to determine the starting position by means of a random number generator.

Shuffle Master recommends that the requirement be changed to "Pai Gow shall be played with three dice which shall be maintained at all times inside a Pai Gow shaker while at the table, unless an electronic display that utilizes a random number generator is in use."

- § 535.7. Wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffle Master respectfully requests a provision be added to accommodate for electronic betting. Many electronic tables now allow bets to be placed using electronic facsimiles of chips; however, the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision be added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

CHAPTER 541. MINIBACCARAT

There is no reference in this section to the Dragon Bonus® side bet submitted by Shuffle Master. We recommend this side bet be added as an option.

- § 541.2. Minibaccarat table physical characteristics.

Part (c) number (3) of this section stipulates that Minibaccarat layouts must be inscribed with "A phrase that states the payout odds for Tie Bets." Electronic tables utilize the ability to change the table between Blackjack and Baccarat. This requirement would not allow an operator the flexibility to change between the two games. Shuffle Master recommends wording be included that layouts must be inscribed with a phrase that states the payout odds for Tie Bets, unless the game is played on a multi game electronic table, in which case, game odds may be displayed on a placard, sign, or LCD monitor on the table.

- § 541.7. Dealing shoe.

This section calls for the use of a manual dealing shoe only. Automatic dealing shoes are often used with electronic score signs or electronic tables. Shuffle Master recommends that the requirement be changed to "The cards used to play Minibaccarat shall be dealt from a manual or automatic dealing shoe specifically designed for that purpose."

- § 541.8. Wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffle Master respectfully requests a provision be added to accommodate for electronic betting. Many electronic tables now allow bets to be placed using electronic facsimiles of chips; however, the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision be added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

- § 541.13. Payout odds; vigorish.

Part (f) of this section stipulates that a certificate holder may “elect to charge every player at a Minibaccarat table a vigorish equal to 25% of the player's wager on the Banker's Hand if the Point Counts of the Banker's Hand and the Player's Hand are equal.” Shuffle Master would like to comment that this is a very unusual vigorish, and most jurisdictions do not call out this type of bet. Shuffle Master recommends that this option be removed from the regulations.

- § 541.14. Irregularities.

There are no provisions included in this section for voiding a game on an electronic table. An example when a game may be voided on an electronic table game is: “If a card reader device malfunctions, the dealer may not continue dealing the game of Minibaccarat at the table until the card reader device is repaired or replaced. If the card reader device is replaced then the game of Minibaccarat must be voided so players may bet again.” Shuffle Master recommends that additional wording be included for electronic table games, to allow a card to be voided if drawn in error.

CHAPTER 543. MIDIBACCARAT

There is no reference in this section to the Dragon Bonus® side bet submitted by Shuffle Master. We recommend this side bet be added as an option.

- § 543.2. Midibaccarat table physical characteristics.

Part (c) number (3) of this section stipulates that Midibaccarat layouts must be inscribed with “A phrase that states the payout odds for Tie Bets.” Electronic tables utilize the ability to change the table between Blackjack and Baccarat. This requirement would not allow an operator the flexibility to change between the two games. Shuffle Master recommends that wording be included that layouts must be inscribed with a phrase that states the payout odds for Tie Bets, unless the game is played on a multi game electronic table, in which case, game odds may be displayed on a placard, sign, or LCD monitor on the table.

- § 543.7. Dealing shoe.

This section calls for the use of a manual dealing shoe only. Automatic dealing shoes are often used with electronic score signs or electronic tables. Shuffle Master recommends that the requirement is changed to “The cards used to play Midibaccarat shall be dealt from a manual or automatic dealing shoe specifically designed for that purpose.”

- § 543.8. Wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffler Master respectfully requests a provision to accommodate for electronic betting. Many electronic tables now

allow bets to be placed using electronic facsimiles of chips, however the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision be added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

- § 543.13. Payout odds; vigorish.

Part (f) of this section stipulates that a certificate holder may “elect to charge every player at a Midibaccarat table a vigorish equal to 25% of the player's wager on the Banker's Hand if the Point Counts of the Banker's Hand and the Player's Hand are equal.” Shuffle Master would like to comment that this is a very unusual vigorish, and most jurisdictions do not call out this type of bet. Shuffle Master recommends that this option be removed from the regulations.

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There are no provisions included in this section for voiding a game on an electronic table. An example when a game may be voided on an electronic table game is: “If a card reader device malfunctions, the dealer may not continue dealing the game of Midibaccarat at the table until the card reader device is repaired or replaced. If the card reader device is replaced then the game of Midibaccarat must be voided so players may bet again.” Shuffle Master recommends that additional wording be included for electronic table games, to allow a card to be voided if drawn in error.

CHAPTER 545. BACCARAT

There is no reference in this section to the Dragon Bonus® side bet submitted by Shuffle Master. We recommend this side bet be added as an option.

- § 545.7. Dealing shoe.

This section calls for the use of a manual dealing shoe only. Automatic dealing shoes are often used with electronic score signs. Shuffle Master recommends that the requirement be changed to “The cards used to play Baccarat shall be dealt from a manual or automatic dealing shoe specifically designed for that purpose.”

Sincerely,



Sheri Johnson
Product Compliance Supervisor