

June 15, 2010

HARRAH'S CHESTER CASINO & RACETRACK

777

Harrah's Boulevard

Richard Sandusky

Director of Regulatory Review

Chester, Pennsylvania 19013

Pennsylvania Gaming Control Board

303 Walnut Street, Strawberry Square

TEL 800

5th Floor, Verizon Tower

480 8020

Harrisburg, PA 17101

Re: <u>Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack</u>

<u>Comments on Proposed Rulemaking Regulation No. 125-120</u>

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. 125-120. Harrah's would like to thank the Board for the opportunity to comment toward the Board's temporary rules, and respectfully requests the Board take into consideration the following suggestions.

I. COMMENTS FOR PROPOSED RULEMAKING NO. 125-120

§525.13 (d) – Procedures for drops at open table games

Temporary table game regulation §525.13 (d) set forth drop procedures for open table games. Specifically, subpart (d) notes that once the signature requirements attesting to the accuracy of the information on the Table Inventory slip have been fulfilled, the original and duplicate copies of the Table Inventory Slip shall be deposited in the drop box ("hot box") that is attached to the gaming table before the drop box is removed from the gaming table as part of the drop.

As drafted, the procedures set forth at temporary regulation §525.13 (d) would establish no record of the opening table game inventory for the drop box being placed into the gaming table as part of the drop ("cold box"). Therefore, the cold box opening inventory could not be reconciled in the count when that box is dropped the following gaming day. Harrah's believes that §525.13 (d) should be revised so that one copy of the Table Inventory slip is deposited in the hot box and the other copy is deposited in the cold box.

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