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VIA E-MAIL & FEDERAL EXPRESS

Susan A. Yocum
Assistant Chief Counsel
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
P.O. Box 69060
Harrisburg, PA 17106-9060

RE: Public Comment on Table Game Equipment Regulation # 125-146

Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is the holder of a table games operation certificate and a Category 1 slot machine license, which authorize GGE to operate Parx Casino in Bensalem, Pennsylvania. GGE respectfully submits the following comments to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's temporary rulemaking, as captioned above, which was published in the Pennsylvania Bulletin at 41 Pa.B. 2329, on May 7, 2011.

The temporary rulemaking at issue addresses several different table game regulations. First, the Bet the Set 21 Wager and the King's Bounty Wager were added to Blackjack as optional side wagers and the High Hand Jackpot payout was added to banking Poker tables. The temporary rulemaking also makes additional changes to the Rules of the Game for Pai Gow and Three Card Poker. Finally, the rulemaking revised the table game internal control requirements for table fills—58 Pa. Code § 525.9.

GGE believes this last change requires additional examination by the Board. The temporary rulemaking requires modifications to the fill request slip. The rulemaking also modifies the paperwork flow between table games and the main cage. This new paperwork flow is completely different from how GGE currently operates.

Currently, the Fill Request Slip is a two-part form that is created at the table game by a pit clerk or floor manager when a manual fill is required—i.e., the computer system that handles fills and credits is not operational. The original copy of the Fill Request Slip is transported to the main cage where a Fill Slip will be created. The duplicate copy of the Fill Request Slip is maintained at the table game until the fill is received and verified, then the slip is dropped in the table game drop box.

Under the temporary rulemaking, the document flow changes 180 degrees. The original will stay at the table game and the duplicate (renamed cage copy) will be transported to the main cage. The preamble to this temporary rulemaking does not describe any rationale for this change. GGE believes changing the paperwork flow is a significant modification that is completely unnecessary. The original copy should be transported to the main cage because as a practical matter, the original copy is the most legible version of the fill request slip, which contains the breakdown of the various denominations being requested. Moreover, the original copy of the fill request slip contains the original signature of the requestor, which is a table game employee. GGE believes this original document should be retained by a department different than the one making said request. As a result of the preceding, GGE respectfully requests that the Board considering reversing itself and changing the requirements of 525.9(c)-(d) back to their original form.

Besides the fill request slip, the temporary rulemaking also requires GGE to change its fill slip paperwork flow. Currently, the original fill slip is maintained at the main cage (i.e., chip bank), the duplicate copy is placed in the table game drop box and the triplicate is placed with the original fill slip as double check performed by the chip banker to ensure that the chip fill was received and processed at the correct gaming table. Moreover, casino revenue auditors from the Finance Department need only check the original and triplicate against the duplicate copy in the drop box.

Under the temporary rulemaking, the document flow changes completely. The original fill slip will be placed in the table game drop box, while the duplicate copy (renamed accounting copy) will be transported and dropped in a locked accounting box. The triplicate copy (renamed cage copy) will be retained by the main cage (i.e., chip bank). Because of the temporary rulemaking, GGE will have three separate copies of the fill slip at three different locations. This is unnecessary and does not provide additional safeguards or protection of assets. It merely creates more work for the Finance Department and its casino revenue auditors. The rulemaking also eliminates any confirmation for the main cage (i.e., chip bank cashier) that the fill was received and processed at the correct table game. Currently, the main cage will receive the original fill slip as confirmation that the fill was properly received and verified. As a result of the preceding, GGE respectfully requests that the Board modify its requirements and allow the original and triplicate copy to be retained by the main cage (i.e., chip bank cashier) until it is forwarded to the finance department.

Susan A. Yocum
Assistant Chief Counsel
Pennsylvania Gaming Control Board
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Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,



Bryan P. Schroeder
Assistant General Counsel
Greenwood Gaming & Entertainment, Inc.

bps

cc: Silvan B. Lutkewitte, III, Chairman, Independent Regulatory Review Commission
Thomas C. Bonner, Esq.