



Senate Committee on Community, Economic and Recreational Development

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Susan A. Yocum
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Pennsylvania Gaming Control Board
P.O. Box 69060
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RE: PGCB Temporary Regulation (Table Games) #125-147 Match Play Coupons (Promotional Play)

Dear Mrs. Yocum:

Having had a chance to review PGCB Temporary Regulation (Table Games) #125-147 that deals with match play coupons (table game promotional play), among other things, I have a few comments that I feel are pertinent and should be taken into consideration and addressed given the very purpose and nature of promotional play in relation to table games; particularly given the intent of the General Assembly in relation to the Pennsylvania Race Horse Development and Gaming Act as amended by Act 1 of 2010.

First, I would like to note that overall this PGCB Temporary Regulation appears to do an adequate job at addressing the subject matter of match play coupons. However, as indicated above, the following should be considered and addressed:

- On page 2 of the related overview document (under the heading "Explanation of Chapters 523, 525, 537, 541, 545 and 571") in relation to section 525.22 (relating to match play coupon) the following change is suggested to the overview document summary as it more accurately reflects the language in section 525.22 itself (see page 13 of Annex A). **[See Attached Copy]**

*Section 525.22 (relating to match play coupon use)
specifies that a promotional match play coupon must be used with an equal value or greater value of gaming chips. The value of the match play coupon is added to the gaming chips wagered by the patron. If the wager wins, it is paid in accordance with the terms and conditions of the match play coupon. Irrespective of whether the match play coupon wins or loses, it is deposited into the table game drop box at the conclusion of each round of play.*

- On page 4 of the related overview document (under the heading "Fiscal Impact – Commonwealth") in relation to section 525.22 (relating to match play coupons) the following changes are suggested to the overview document summary as such is a more accurate interpretation and reflection of the intent and purpose of match play coupons. **[See Attached Copy]**

* * *

Regarding the fiscal impact of the Commonwealth with the addition of promotional match play coupons, although the payment of a winning wager that includes the value of the match play coupon ~~will~~ may have a negative effect on ~~the table inventory~~ a specific table's inventory in relation to a specific round of play or series of play, match play is intended to increase the overall amount of table game play and thus the revenue to the facility and the tax collected for the Commonwealth of Pennsylvania.

* * *

- On page 1 of Annex A (Title 58. Recreation, Part VII. Gaming Control Board, Subpart K. Table Games, Chapter 523. Table Game Equipment) the following change is suggested to section 525.1 (relating to definitions) in that it comports with the provisions and language on page 13 regarding section 525.22 (b) (relating to match play coupon use). [**See Attached Copy**]

§ 525.1 Definitions

Match play coupon – A coupon with a stated value that when presented with gaming chips of equal value or greater value by a patron at a table game is included in the amount of the patron's wager.


- On page 5 of Annex A (Title 58. Recreation, Part VII. Gaming Control Board, Subpart K. Table Games, Chapter 523. Table Game Equipment) the following change is suggested to section 525.19 (z) (relating to procedures for opening, counting and recording the contents of table game drop boxes) in that the recommended changes comports with the language as amended by the PGCB Board. [**See Attached Copy**]

Section 525.19 Procedures for opening, counting and recording the contents of table game drop boxes.

(z) A count room employee, in the presence of the casino compliance representative who observed the count, shall conduct a thorough inspection of the entire count room and all counting equipment located therein to verify that no currency, value chips, Poker rake chips, Match Play Coupons ~~[and] or~~ , gaming vouchers, Counter Checks or the Table Inventory Slips remain in the room.

Thank you for considering these suggestions. If you have any questions or comments please contact Jason R. Brehouse, Esq. at 717-787-8927 or jbrehouse@pasen.gov.

Sincerely,


Senator Jane M. Earll
49th District

Attachment