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PAGCB  
P.O Box 69060  
Harrisburg, PA 17106-9060  
Attention: Public Comment

To the members of the Pa gaming control board,

I am supporting the draft junkets.

Sincerely Yours,

  
Greg Stanseski

Topic: Draft junkets

NOV 10 2005

## DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE 11/07/2005 ADDRESS 1

SECTION # OR SUBJECT Junket Regulations ADDRESS 2

FIRST NAME CITY

LAST NAME STATE

ORGANIZATION NAME Philadelphia Gaming Advisory Task Force ZIP CODE

EMAIL ADDRESS COUNTY

TELEPHONE

COMMENTS The comments of the Philadelphia Gaming Advisory Task Force are attached.

**Comments of the Philadelphia Gaming Advisory Task Force****Junkets**

Submitted November 7, 2005

By and through undersigned counsel, the Philadelphia Gaming Advisory Task Force respectfully submits these comments pursuant to the Pennsylvania Gaming Control Board's Order of October 6, 2005. The Task Force makes several recommendations in connection with the "junket" regulations.

**Motor Coaches**

The Task Force is significantly concerned about the impact that buses will have on the streets and highways of Philadelphia. Even applying a conservative estimate of 8 percent motor coach arrival (see page 129 of the Task Force's final report), the Task Force estimates that approximately half-a-million visitors annually will arrive at Philadelphia casinos on dedicated bus junkets.

As detailed on pages 71-73 of the Task Force's final report, the City is exploring how best to address these issues, and the solutions will likely require cooperation with local, state and federal highway officials. Whatever solution is adopted, junket regulation and control will be an essential part of how the solution is enforced. Towards that end, any arrival by bus (other than regularly scheduled local transportation authority buses and casino employee shuttles) should be treated as a junket, whether or not it is arranged by casino employees and whether or not \$200 in consideration is provided.

The Task Force suggests that the Board require that all junket schedules and amended schedules require that the junket operator and casino certify (i) the expected route to be taken by any motor coach, (ii) whether the bus involved will be stored on-site, off-site, or whether it will be stored on public roadways – storage on public roadways should be grounds for rejection, (iii) where the bus will be stored off-site and routes from the casino to and from such storage area, and (iv) whether the routes and storage plan have been pre-approved by local (and if applicable state) roadway officials. Additionally, bus junkets should not be permitted to utilize any road not certified for the weight of the vehicle when fully loaded.

Any junket schedule or amended junket schedule that relies on bus transportation should also be furnished to the municipality at the time of filing with the Board, and no amended schedule utilizing motor coaches should be permitted to be filed less than two full business days before the proposed date of the junket.

Additionally, all junket final reports for junkets involving buses should indicate the routes taken to and from the casino and (if appropriate) to and from storage and identify where the bus was stored.

Finally, any casino that will utilize bus junkets must have the capacity of expected buses in a manner that does not require storage or stacking onto public roadways. This should include designated areas on-site to load and unload passengers, a minimum number of bays on-site (in Philadelphia the Task Force recommends at least ten bays, but this amount should be set to allow the casino's schedule to operate without stacking), and should require that any bus standing more than ten minutes must be required to shut down its engines in all weather conditions.

### Municipal Tax Clearance

Junket operators should be required to submit tax clearance forms from the jurisdiction hosting the casino as well as from the Commonwealth. The Task Force understands that the Board can only require that the operator has sought such clearance, but if no clearance form is available, operators should certify that they have provided all information sought by the municipality.

### Nondiscrimination

The junket prohibitions in section 439.11 should be amended to include a prohibition on discrimination based upon race, color, religion, national origin or ancestry, sex, sexual orientation, or age (other than requiring the participant be of legal gambling age). This prohibition should extend to, but not be limited to, both participation in the junket and employment with the junket enterprise.

Respectfully Submitted,



Romulo L. Diaz, Jr., General Counsel  
Philadelphia Gaming Advisory Task Force