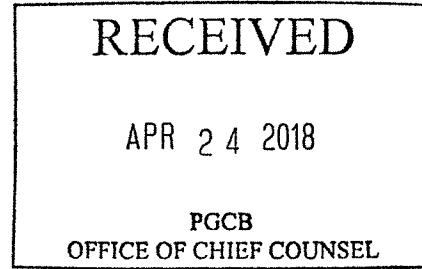




April 16, 2018

R. Douglas Sherman  
Chief Counsel, Pennsylvania Gaming Control Board  
P.O. Box 69060, Harrisburg, PA 17106-9060



Attention: Public Comment on Regulation #125-211

Dear Mr. Sherman:

On behalf of IGT, I would like to thank the Pennsylvania Gaming Control Board (PGCB) for the opportunity to submit the following observations and suggested changes for consideration regarding Regulation #125-211 Temporary Rulemaking for the conduct of video gaming at licensed truck stop establishments in the Commonwealth [58 PA. Code CHS. 1101-1120] published in the Pennsylvania Bulletin March 17, 2018:

*§1112.7. Video gaming terminal minimum design standards (a)(2) & (d)(3) restricts all possible combinations to be independent of each cycle of the game. IGT observes in some video gaming terminal markets, there are themes in which the outcome of a game cycle may trigger features available during the next game cycle(s) as defined by game rules. IGT suggests consideration for allowance of these game types if the player is informed by the rules of the play with the following language changes below:*

*“§1112.7 (a) (2) Except as provided by the rules of the game, the finite set of all possible combinations which shall be known as the cycle of the game. All possible combinations in a video gaming terminal cycle shall be independent of each other and of all possible combinations from cycles in other video gaming terminal.”*

*“§ 1112.7 (d) (3) Except as provided by the rules of the game, each possible video gaming terminal combination which produces winning or losing video gaming terminal outcomes must be available for random selection at the initiation of each play.”*

Should you have any questions or wish to discuss, please contact Robert Wood, IGT Product Compliance Regional Manager at [Robert.Wood@IGT.com](mailto:Robert.Wood@IGT.com) 609-742-0289 or Carrie Porterfield, IGT Product Compliance Manager Jurisdictional Requirements as [Carrie.Porterfield@IGT.com](mailto:Carrie.Porterfield@IGT.com) 702-669-8966.

Sincerely,

Carrie Porterfield  
IGT Product Compliance Manager Jurisdictional Requirements  
6355 S. Buffalo Drive, Las Vegas, NV 89113

cc: Heather Worner, PCGB Bureau of Gaming Laboratory Operations  
Robert Wood, IGT Product Compliance Regional Manager