



March 30, 2010



**HARRAH'S
CHESTER CASINO
& RACETRACK**

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Richard Sandusky
Director of Regulatory Review
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
5th Floor, Verizon Tower
Harrisburg, PA 17101

Re: **Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack
Comments on Temporary Table Game Rulemaking Regulation Nos. 125-110, 125-111,
and 125-113**

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 Nos. 125-110, 125-111, and 125-113. Harrah's would like to thank the Board for the opportunity to comment and share gaming industry best practices toward the Board's temporary rules, and respectfully requests the Board take into consideration the following suggestions.

Harrah's concurs with the comments made by the other slot machine licensees in commending the Board for taking into consideration for its own table games regulations provisions related to the rules for table games administered by the New Jersey Casino Control Commission and other gaming jurisdictions. The provisions set forth under the New Jersey Casino Control Act and its regulations are a viable



reference to emulate regulations as they are designed to assure operational efficiency, asset security, and public confidence in the integrity of casino gaming. However, Harrah's encourages the Board to consider that although such table games rules and regulations promulgated by New Jersey and other neighboring jurisdictions are a useful reference source, many of the current table games rules and regulations from these casino gaming jurisdictions were applicable during an era where table game technology and procedures surrounding table game administrative practices were minimal, and in some instances, non-existent.

Therefore, it is important to recognize that casino table games have greatly advanced in technology and evolved into numerous ways of gaming, wagering and betting that today's customers have come to enjoy. Harrah's encourages the Board to continue to be flexible toward table game rules options which are fitting, adaptive, and would allow properties to offer the best table game product available. The overall objective for table game play should be one that is efficient, provide the best advantage, and be entertaining enough to accommodate what the public wants and come to expect.

As such, Harrah's respectfully request that the Board specifically note the following comments in regard to the Board's temporary table games rulemakings:

I. COMMENTS FOR PROPOSED RULEMAKING NO. 125-110

§537.3. (a)(4) (b) (iii) - Permissible Wagers, Buy Bets and Lay Bets

The Board's temporary regulations define wagers that may be used in the games of Craps and Mini-Craps, specifically:

1. In subpart (a)(4) (b) (iii), it is noted that if a total of 12 is thrown on the roll immediately following placement of a Don't Come Bet, the Don't Come Bet shall be void and any Don't Come Bets shall be returned to the players.

Harrah's believes that returning the "Don't Come Bet" to the player will exacerbate the flow of the craps game. Instead of handing the "Don't Come Bet" back to the players, the bet should be allowed to remain on the table. A preferred game play procedure for the voiding of a "Don't Come Bet" is signified as a push by allowing the dealer to tap the area indicating no action on the bets.

2. Buy Bets and Lay Bets --- There appears to be no additional language to allow Buy Bets or Lay Bets whereby the player may pay a vigorish, normally 5% of the

wager to receive true odds. Additionally, Lay bets typically are considered to be active on a come out roll, unless called "off" by the player and confirmed by the dealer through placement of an "off" marker button on top of the player's wager.

Buy Bets and Lay Bets are important functions common to the fundamental play of Craps and are allowed in many gaming jurisdictions including New Jersey. See, N.J.A.C §19:47-1.5 (*True odds on place bets (buy and lay bets); vigorish prohibited*). Harrah's believes that provisions to allow Buy Bets and Lay Bets should be included in section §537.3 of the Board's temporary regulations.

§537.5. (b) - Payout odds.

The Board's temporary regulations define payout odds in the games of Craps and Mini-Craps. Harrah's believes that if the Board intends to include provisions addressing Buy Bets and Lay Bets within section §537.3, this subpart should be updated to reflect payout odds for those respective winning wagers.

§549.2 (c) - Blackjack table; card reader device; physical characteristics; inspections.

In section §549.2 (c), the Board's temporary regulations require certificate holders to inscribe on its blackjack game layout the following:

- Blackjack pays 3 to 2.
- Dealer shall draw to 16 and stand on all 17's.
- Insurance pays 2 to 1.

In many gaming jurisdictions, such as Nevada, casinos are allowed to pay 6 to 5 odds on a winning blackjack wager. Additionally, blackjack traditionally incorporates a "house advantage". The basic strategy for a blackjack player is to avoid a bust regardless of whether the dealer subsequently busts. While favorable for the player, standing on all 17s will shift the blackjack game play dynamic and subject certificate holders to an unfavorable loss rate. Harrah's believes that certificate holders should be provided the option to pay 6 to 5 odds as well as hitting on "soft 17s". Appropriate notification via signage at the table would be made available to alert players that the dealer will hit on "soft 17s".

§549.3 - Cards; number of decks; value of cards.

The Board's temporary regulations at §549.3 specify the number of decks of cards to be used in the game of Blackjack as well as require all decks of cards used for the play of Blackjack to be identical in appearance and played with at least one cutting card.. However, unlike the Board's temporary regulations at §541.3 (Minibaccarat), §555.3 (Caribbean Stud Poker), §557.3 (Four Card Poker), §559.5 (Let It Ride Poker), §561.3 (Pai Gow Ride Poker), §565.3 (Three Card Poker), and §563.3 (Texas Hold'em Poker), the timeframe for changing card decks used in the game of Blackjack appears to not be indicated.

Harrah's believes that additional language addressing the timeframe to change Blackjack card decks used for game play should be included in the Board's temporary regulations for Section §549.3. Further, Harrah's suggests that certificate holders be allowed to change the decks of cards used in Blackjack at least once every 24 hours.:

§549.4 (f) -Wagers

The Board's temporary regulations stipulate in regard to blackjack wagers that after each round of play is complete, the dealer shall collect all losing wagers and then pay off all winning wagers.

Harrah's believes that certificate holders should have the option to handle each wager individually, in a counterclockwise fashion, in order. Handling wagers in this manner will help reduce risk and errors associated with newly trained dealers across this Commonwealth as they become accustomed to table game practices on the live gaming floor.

§549.5 (b) - Opening the table for gaming. & §549.6 (a) – Shuffle and cut of the cards

The Board's temporary regulations §549.5 (b) in regard to opening a blackjack table specify that after the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall then be spread out in horizontal fan shaped columns by deck according to suit and in sequence. However, in Section §549.6 (a), it is noted that immediately prior to commencement of play, unless the cards were preshuffled, the dealer shall shuffle the cards so that they are randomly intermixed. There appears to be some confusion whether preshuffled cards are allowed to be used on gaming tables. If preshuffled cards received from the vendor can be utilized by certificate holders, then

fanning cards for inspection in accordance to suit and sequence would be difficult to accomplish under subpart §549.5 (b).

Harrah's believes certificate holders should have the option of utilizing pre-shuffled decks of cards by an approved vendor. Pre-shuffled cards are quickly becoming commonplace in many gaming jurisdictions as it reduces the time required to prepare a table for play. If the Board does not intend to allow certificate holders to use reshuffled decks received from the vendor, then, further clarification on the use of pre-shuffled cards is necessary for subpart §549.6 (a).

§549.6 (e) - Shuffle and cut of the cards.

In section §549.6 (e), the temporary regulation notes that once the cutting card has been inserted by the player, the dealer shall take all cards above the cutting card and place them on the bottom of the stack. The dealer shall then take the entire stack of cards that was just cut and align them along the side of the dealing shoe which has a mark that will allow the dealer to insert the cutting card in the stack at a position at least approximately one-quarter of the way in from the bottom of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.

Harrah's believes that the shoe measurement should be at the discretion of the certificate holder. Such an option would provide more cards to be dealt within the shoe.

§549.7 (k) - Procedure for dealing cards.

The Board's temporary regulations specify certain provisions whenever the cutting card is reached in the deal of the cards. However, there does not appear to be language that addresses the possibility if the cutting card is the first card to be dealt. Harrah's believes such instances should be at the certificate holder's discretion as well as indicated in rules of the game submission of the certificate holder.

§549.9 (a) - Surrender

The Board's temporary regulations notes that after the first two cards are dealt to the player and the player's point total is announced, the player may elect to discontinue play on his hand for that round by surrendering one-half his wager. All decisions to surrender shall be made prior to the player indicating whether he wishes to double down as permitted under §549.11 (relating to Double Down Wager), split pairs

as permitted under §549.12 (relating to splitting pairs), stand or draw permitted under §549.13 (relating to drawing of additional cards by players and the dealer).

This subpart appears to suggest that the option to surrender is mandatory for the certificate holder. Harrah's believes that the surrender game play option should be at the discretion of the certificate holder with proper signage at the table and indicated within the certificate holders rules of the game submission.

§549.12 (c) (1) - Splitting Pairs

In Section §549.12 (c), it is noted that a player may split one more pair if the second card dealt is identical in value to a card of the split pair for a total of three hands. Harrah's believes that certificate holders should have the option to allow three splits to create four hands. Splitting to four hands enhances the game play dynamic for the player.

§549.16 (k) - Irregularities

In Section §549.16 (k), it is noted that if a card reader device malfunctions, the dealer may not continue dealing the game of Blackjack at that table until the card reader device is repaired or replaced. It should be noted that although card reader devices are an important feature, its usage is supplemental in regard to conventional blackjack game play. Harrah's believes that certificate holders should be allowed the option to continue play in a conventional manner without checking for "Blackjack", until the card reader device is repaired or replaced.

II. COMMENTS FOR PROPOSED RULEMAKING NO. 125-112

§553.2. (b)(2) - Poker table physical characteristics

In section §553.2 (b)(2), the temporary regulation notes that a layout for a Poker table shall be approved by the Bureau of Gaming Operations and contain, at a minimum, a designated holding area located to the right of the dealer for the collection of the rake prior to final placement of the rake in the drop box.

Typically in a casino poker room, the rake is recycled through the rack or table inventory. Recycling the rake prevents frequent replenishment of the table impressments and is a practice that is done in gaming jurisdictions like New Jersey. Harrah's further believes that depositing the rake in the drop box could reasonably be

managed if certificate holders are allowed to maintain a separate chip bank in its poker room.

§553.16 (p) -- General operating rules for all types of Poker; handling of irregularities.

In section §553.16 (p), the temporary regulation notes that any automated card shuffling device shall be removed from a gaming table before another method of shuffling may be utilized at that table.

Very often, automated shuffling devices malfunction prior to the completion of the device's shuffling process. As such, the Board's temporary regulations do not indicate any recourse if the automated card shuffling device is not complete with the shuffle and the next hand is ready to be dealt. In such instances, Harrah's believes certificate holders should be allowed to utilize a hand shuffle without removing the shuffler under the assumption that automated shuffled cards would be made available for the subsequent hand.

§553.20. (h) - Bad Beat payouts; posting of rules.

The Board's temporary regulation §553.20 (h) indicates that at least once a day and immediately upon notification of a Bad Beat verification by the poker shift supervisors, a finance department representative shall adjust each Bad Beat payout amount displayed in the Poker area to reflect the current Bad Beat payout amount and verify that the amount of any Bad Beat payout corresponds to the amount being displayed to patrons.

In a traditional Bad Beat set up, chips are counted once a day. Once the Bad Beat payout is posted, the prior Bad Beat chips are dropped toward the previous gaming day. It is therefore not particularly clear within this subpart whether the Board is indicating that a count be conducted of additional Bad Beat chips after the daily total has already been updated, and if certificate holders would be required to make Bad Beat chip adjustments for a second time in a gaming day to match remaining chips available to payout to players.

Harrah's requests further clarity on this subpart and highly recommend the Board allow certificate holders the option to only update Bad Beat chips once per day. Any additional monies collected would be attributed to the next day's jackpot.

§557.7. (a)(1) - Wagers

The Board's temporary regulations §557.7 (a) (1) in regard to Four Card Poker wagers specify that a player may compete solely against the dealer by placing an Ante Wager in an amount within the posted minimum and maximum wagers posted at the table and then placing a Play Wager in an amount from one to three times the amount of the Ante Wager.

Harrah's believes certificate holders should be allowed the option to require a compulsory placement of an Ante Wager with any Aces Up Wager similar to the provisions set forth at §565.7 (Wagers) of the Board's temporary regulations for Three Card Poker.

§557.11. (e) Through (f) - Play Wagers; Procedures for completion of each round & §565.11. (d) Procedures for completion of each round

In Section §557.11 subparts (e) through (f), it stipulates in regard to Four Card Poker pay wagers that the dealer shall then reveal the dealer's cards and select the four cards that form the highest possible ranking hand....

(f) The dealer shall then settle the winning wagers remaining on the table.

In Section §565.11 (d), it is noted for Three Card poker pay wagers that the dealer shall settle the wagers remaining on the table, starting with the player farthest to the dealer's right and continuing counterclockwise around the table until the following procedure has been completed for all of the remaining players.

Similar to Harrah's comments noted for subpart §549.4 (f) above, certificate holders should have the option to handle each wager individually, in a counterclockwise fashion, in order. Handling wagers in this manner will help reduce risk and errors associated with newly trained dealers across this Commonwealth as they become accustomed to table game practices on the live gaming floor.

III. COMMENTS FOR PROPOSED RULEMAKING NO. 125-113

§541.3 (c) - Cards; number of decks

The Board's temporary regulations at §541.3 stipulate that the decks of cards opened for use at a Minibaccarat table shall be changed at least once every four hours.

Changing Minibaccarat decks every four hours appears to be excessive and, theoretically, would mean cards would need to be changed after every few shoes. Harrah's believes that Minibaccarat decks should be changed once every 24 hours unless cards are handled by the players. This is consistent with Minibaccarat deck changing practices in other gaming jurisdictions.

§541.4. (b) - Opening of a table for gaming

In Section §541.4 (b), it is noted for MiniBaccarat that following the inspection of the cards by the dealer...The cards shall be spread out in horizontal rows by deck according to suit and in sequence....

Similar to Harrah's comments noted for subpart §549.5 (b) and §549.6 (a) referenced above; Harrah's believes certificate holders should have the option of utilizing pre-shuffled decks of cards by an approved vendor.

§541.5 (h) - Shuffle and cut of the cards.

In Section 541.5 (h), it is noted that if there is no gaming activity at a Minibaccarat table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table either face up or face down.

Harrah's believes that certificate holders should be allowed the option to not break the shoe as it wastes significant time in the shuffle and reload process.

§541.9 (d) - Hands of player and banker; procedure for dealing initial two cards to each hand.

The Board's temporary regulations at §541.9 (d) stipulate in regard to Minibaccarat that players may not handle, remove or alter any cards used to play Minibaccarat.

Harrah's believes certificate holders should have the option to allow players to handle the cards, provided appropriate signage is posted, and in that instance cards will be changed after every shoe.

§541.12. (b) - Announcement of result of round; payment and collection of wagers & §543.12 (b) - Announcement of result of round payment and collection of wagers

In Sections §541.12 (b) and §543.12 (b), it is noted that after the result of the round is announced, the dealer responsible for the wagers on the table shall first collect each losing wager. After the losing wagers are collected, the dealers shall, starting at the highest numbered player position at which a winning wager is located, mark or collect the vigorish owed by that player and immediately thereafter pay that player's winning wager.

Harrah's believes that certificate holders should be allowed to mark the commission after paying the winning wagers.

§541.14 (c) – Irregularities & §534.14 (c) - Irregularities

In Sections §541.14 (c) and §534.14 (c), it is noted that if a card dealt in error is disclosed at the time it is dealt, the dealer shall place the disclosed card and one additional card drawn face down from the dealing shoe in the discard rack without disclosing the additional card.

Harrah's believes that certificate holders should have the option to deal a hand, using the disclosed cards on which no wagering would be allowed to keep the continuity of the shoe. This is also referred to as dealing a "Phantom Hand".

§543.9 (c) (3) - Hands of player and banker

The Board's temporary regulations at §543.9 (c)(3) specifies in regard to Midibaccarat that the first and third cards dealt shall be placed face down on the area designated for the Player's Hand and the second and fourth cards dealt shall be placed face down on the area designated for the Banker's Hand. After all four cards have been dealt; the dealer shall place the Banker's Hand underneath the right corner of the dealing shoe until the Player's Hand.

Harrah's believes that further language is necessary to understand the game play sequence after "Player's Hand."

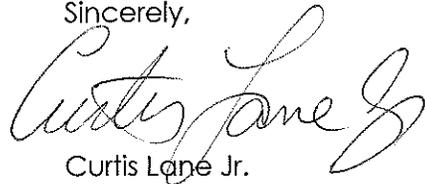
§543.10 - Procedure for dealing a third card.

The Board's temporary regulations at §543.10 only allow facing the cards in player/banker order. Harrah's believes certificate holders should have the option to deal Macau style, where the hands can be faced in any order. Procedures should be written by the certificate holder to address the integrity of the game.

Sandusky
March 30, 2010
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Harrah's wishes to thank the Board for requesting input on these matters and hope our comments are helpful for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Curtis Lane Jr." The signature is written in black ink and is positioned above the printed name.

Curtis Lane Jr.

Regulatory Compliance Manager

Harrah's Chester Casino and Racetrack