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Richard Sandusky, Director of Regulatory Review
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, Pennsylvania 17106-9060
Attention: Public Comment on Regulation #125-110

Dear Mr. Sandusky:

Thank you for allowing Shuffle Master, Inc. ("Shuffle Master") the opportunity to comment on the Temporary Table Games Regulations adopted by the Pennsylvania Gaming Control Board. After our review, we would like to provide the following comments:

Chapter 521. General Provisions

- § 521.3. Table games surveillance requirements.

Shuffle Master would recommend surveillance requirements for electronic table games are addressed for player terminals. (Typically 12 or more player terminals.)

Chapter 529. General Licensing Requirements

- § 529.1. Table Game Devices – Conditional Licenses.

Shuffle Master requests that the information that is specified to be supplied to the Bureau of Licensing in Part (c), which includes the amount paid by the applicant or licensee for table game devices, not be made available to casino operators and/or the public, as pricing information for the operators could be detrimental for remaining competitive.

Chapter 531. Roulette

- § 531.4. Placement of wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffler Master respectfully requests a provision to accommodate for electronic betting. Many electronic tables now

allow bets to be placed using electronic facsimiles of chips, however the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision is added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

- § 531.7. Irregularities.

There are no provisions included in this section for voiding a game on an electronic table. An example when a game may be voided on an electronic table game is: If the roulette ball leaves the wheel during the spin, the dealer shall announce "No Spin" and void the game so players may bet again.

Chapter 537. Craps and Mini-Craps

- § 537.2. Craps and Mini-Craps tables; physical characteristics.

Throughout this section a "Fire Bet" is referenced. A "Fire Bet" is a proprietary bet owned by a single company. There are other variations of this bet in existence so Shuffle Master suggests changing the term to "any type of repeater bet".

- § 537.4. Making and removal of wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffler Master respectfully requests a provision to accommodate for electronic betting. Many electronic tables now allow bets to be placed using electronic facsimiles of chips, however the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision is added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

Chapter 549. Blackjack

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

Part (c) of this section stipulates that Blackjack layouts must be inscribed with "Blackjack pays 3 to 2". Shuffle Master recommends that a payout of "6 to 5" or other be permissible when using six decks of cards or more.

Additionally electronic tables utilize the ability to change the table between Blackjack and Baccarat. The physical characteristic requirements of this section call for payouts to be inscribed on the layout. This requirement would not allow an operator the flexibility to change between the two games. Shuffle Master recommends that the payouts are not required to be inscribed on the layout, instead allow the payouts to be displayed on a placard, sign or LCD monitor on the table.

Part (e) of this section requires a card reader device. Electronic tables do not need to utilize such devices since the table automatically alerts the dealer via the electronic system if a Blackjack is present.

- § 549.4. Placement of wagers.

Since there are no prohibitions in this section for electronic betting, can Shuffle Master assume electronic facsimiles of chips are permitted? If not, Shuffler Master respectfully requests a provision to accommodate for electronic betting. Many electronic tables now allow bets to be placed using electronic facsimiles of chips, however the players still cash-out and buy-in using standard chips or other funds.

In addition, Shuffle Master would request that a provision is added to define acceptable forms of buy-in and cash-out on a table game, to include, but not be limited to: cash, chips, tickets, player comps, or electronic credits.

- § 549.7. Procedure for dealing cards.

Part (e) of this section requires a card reader device. Electronic tables do not need to utilize such devices since the table automatically alerts the dealer via the electronic system if a Blackjack is present.

- § 549.16. Irregularities.

There are no provisions included in this section for voiding a game on an electronic table. An example when a game may be voided on an electronic table game is: "If a card reader device malfunctions, the dealer may not continue dealing the game of Blackjack at the table until the card reader device is repaired or replaced. If the card reader device is replaced then the game of Blackjack must be voided so players may bet again."

Sincerely,



Christopher Cook
Product Compliance Technical Liaison