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May 14, 2010

Richard Sandusky
Director of Regulatory Review
Pennsylvania Gaming Control Board
303 Walnut St., Strawberry Square
Verizon Tower, 5th Floor
Harrisburg, PA 17106

Re: Comments to Temporary Table Game Rulemaking No. 125-116

Dear Mr. Sandusky:

The United States Playing Card Company (“USPC”), applicant for a manufacturer license of table game devices with a principal place of business located at 300 Gap Way, Erlanger, Kentucky, respectfully submits these Comments in response to the Pennsylvania Gaming Control Board’s (“PGCB” or the “Board”) temporary table game rulemaking number 125-116 (the “Rulemaking”).

I. Introduction & General Comment

Overall USPC applauds the Board’s efforts in the Rulemaking as they concern table game equipment. In particular, the PGCB’s recognition of the growing popularity of pre-shuffled cards will produce positive results for players, operators and the Commonwealth.

Based on its experience in multiple jurisdictions, however, USPC respectfully offers two specific suggested revisions to the Rulemaking. USPC, maker of the world’s leading playing card brands, holds over 100 licenses and services more than 500 commercial and tribal casinos in North America. Through its affiliates, USPC’s products also have a significant presence in gaming jurisdictions in Europe, the Caribbean and Asia. In crafting its regulations on table game equipment, USPC urges the PGCB not to focus on or follow a single or isolated jurisdiction. Rather, the Board should consider the regulatory trends and experiences of a variety of jurisdictions, particularly those, like Pennsylvania, that are newer to gaming and allow for more flexibility to accommodate the latest equipment advancements and player preferences in the industry.

II. Specific Comments

A. Section 523.12 – Dice

Section 523.12(a)(1) of the Rulemaking requires that each die used in a table game: “Be formed in the shape of a perfect cube and of a size no smaller than 0.750 of an inch on each side nor any larger than 0.775 of an inch on each side.” 58 Pa. Code § 523.12(a)(1). USPC agrees with the provision’s size range, as the identified sizes are common in the industry.

However, USPC urges the Board to clarify its regulation so as to allow for a tolerance of +/- .005 of an inch as to each end of the size range. Like virtually all production processes, the making of dice can be very precise, but still not be to an exact size each and every time a die is manufactured. Human and mechanical elements result in the potential for minor variances, or tolerances, on both the plus or minus side of any specified size.

Accordingly, in order to realize the full intent of the cited size range in Section 523.12(a)(1), a tolerance should be acknowledged in the regulation. Otherwise, operators will not be able to order and manufacturers will not be able to make a die at the size of 0.750 or 0.775 of an inch for fear that an otherwise acceptable and appropriate tolerance will render the die in violation of the regulation and unusable. USPC’s proposed tolerance of +/- .005 of an inch is an accepted industry standard.

B. 523.15(j) – Poker Cards

Section 523.15(j) requires that each operator that elects to offer the game of Poker use, on a daily basis, at least six visually distinguishable card backings for the cards used in Poker. While USPC applauds the Board’s allowance of a variety of ways to distinguish the card backs (and permission of generic/non-requirement of custom cards), the Company submits that requiring six different backings is unnecessary, serves no security purpose, and is out of step with the regulatory trend in the vast majority of gaming jurisdictions.

Indeed, in all of the jurisdictions in which USPC does business in North America, only one jurisdiction (New Jersey) requires the use of six different card backings for Poker. The more common practice is to require only two different backings for Poker games and, with the exception of New Jersey, no more than four. The requirement to produce six different backings is also cumbersome on manufacturers and more costly for operators, as the volume of cards needed with a particular backing is reduced.

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III. Conclusion

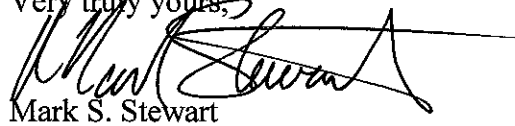
USPC appreciates the opportunity to comment on Rulemaking No. 125-116. Based on the comments herein, USPC urges the Board to clarify and/or amend its Rulemaking as follows:

(a) amending Section 523.12(a)(1) to read: "Be formed in the shape of a perfect cube and of a size no smaller than 0.750 (+/- .005 tolerance) of an inch on each side nor any larger than 0.775 (+/- .005 tolerance) of an inch on each side."; and

(b) amend Section 523.15(j) so as to require only two (2) visually distinguishable card backings for the cards used in Poker games.

Thank you for your consideration of these comments.

Very truly yours,



Mark S. Stewart

MSS/jls

cc: Stephanie Krummert