



PENNSYLVANIA GAMING CONTROL BOARD
303 WALNUT STREET, COMMONWEALTH TOWER
HARRISBURG, PENNSYLVANIA 17101

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May 4, 2023

Chair
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PAT BROWNE
STACY GARRITY
RUSSELL C. REDDING

Delivered Via Electronic Mail

TO: All Interactive Gaming Certificate Holders,
Interactive Gaming Operators, and
Interactive Gaming Manufacturers

RE: Splitting Hands in Random Number Generator Based Blackjack

Dear Licensees:

You are receiving this letter to inform you of the Pennsylvania Gaming Control Board's ("Board") review regarding splitting hands in random number generated ("RNG") based interactive blackjack games. Pursuant to the Board's regulations, when a blackjack hand is split, it is to be split horizontally, creating a left and right hand. The dealer shall then deal a card to and complete the player's decisions with respect to the first hand (dealer's left/ player's right) prior to proceeding to deal any cards to the second hand (dealer's right/ player's left). See 58 Pa. Code §§ 633a.11 (Blackjack), 635a.11 (Spanish 21), 655a.11(Double Attach Blackjack), 672a.10 (Free Bet Blackjack), 673a.11(Double Blackjack), and 685a.10 (Down Under Blackjack).

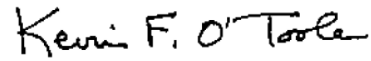
The Board recognizes that Patrons may use a variety of devices to engage in Pennsylvania's interactive gaming, and that these devices allow for interactive games to be presented in both portrait and landscape layouts. When Patrons are playing games in a portrait layout, the Board is aware that horizontal game play space is limited. With that in mind, the Board wishes to communicate to you its position regarding splitting hands in RNG based interactive blackjack games.

When a Board approved RNG based interactive blackjack game is being played on a device in a portrait layout, a split hand may be split vertically rather than horizontally as is prescribed in the regulations. The game may proceed with resolving either the top or bottom hand first, so long as it remains consistent with the rules submitted and approved by the Board. All other aspects of game play regarding splitting hands shall follow the regulations. The intention of the Board is to allow interactive gaming certificate holders, operators, and manufacturers to optimize gaming in portrait device layouts to continue to provide Patrons with top-tier gaming experiences.

This Board interpretation shall not affect RNG interactive blackjack being played in a landscape layout, live-dealer interactive blackjack games, nor blackjack offered in brick-and-mortar casinos. In these instances, splitting hands in blackjack shall continue to operate as prescribed in the Board's regulations.

If you have any questions or concerns on this matter, please do not hesitate to contact Assistant Chief Counsel, Robert Wood, via email at rmwood@pa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kevin F. O'Toole". The signature is written in a cursive, slightly slanted style.

Kevin F. O'Toole
Executive Director

KFO/rmw

cc: Steve Cook, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Lee Copello, Director of iGaming Compliance, PGCB
Christopher Schroder, Director, Bureau of Casino Compliance, PGCB
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB