



PENNSYLVANIA GAMING CONTROL BOARD
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February 7, 2025

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Sent via Electronic Mail

Interactive Gaming Certificate Holders
Interactive Gaming Operators
Interactive Manufacturers that Operate Live Dealer Studios

**RE: Industry Guidance – 2025-02
Deduction Eligible Promotional Play on Live Dealer Interactive Table Games**

Dear Certificate Holders, Operators and Live Dealer Studio Manufacturers:

The Pennsylvania Gaming Control Board (“Board”) is issuing this industry guidance to clarify its stance on the deductibility of promotional play wagers on authorized live dealer interactive table games. Those casino games, as defined by 58 Pa. Code § 801a.2, are authorized by the Board and conducted either in a live table game studio or through simultaneous play at table games located in licensed facilities. Simultaneous play table games are live games available to both on-site patrons and registered players on interactive gaming platforms.

Before the launch of the Commonwealth’s first live gaming studio in October 2020, Board staff reviewed requests to utilize promotional play wagers on live dealer studio table games in a manner similar to interactive games which simulate slot machine play. At that time, Board staff informed operators they could either block the use of promotional play wagers entirely or allow them, provided they were treated as cash wagers when calculating gross interactive table game revenue. Board staff emphasized that promotional play deductions were not permitted under either option. Additionally, following the launch of the live table game studio, Board staff advised that they would periodically review the performance of live dealer table games and evaluate whether changes to the policy were appropriate.

Upon further review of the performance of live table game studios, the Board is issuing this guidance to notify operators of a change in policy regarding the treatment of promotional play wagers on live dealer table games. Effective May 1, 2025, promotional play wagers on live dealer table games will be eligible for deduction in the calculation of gross interactive table game revenue, provided certain conditions are met.

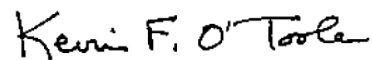
To qualify for deduction, operators must demonstrate compliance with the following requirements for promotional play wagers on live dealer table games:

- Promotional play may only be utilized on main wagers that have payout odds of 1 to 1. An exception is allowed for payout odds of 3 to 2 on player blackjack outcomes in blackjack or similar authorized blackjack-like games (including but not limited to Spanish 21, Free Bet Blackjack, Down Under Blackjack, Double Attack Blackjack) as approved by the Board.
- Promotional play wagers must result in unrestricted cash payouts that players can withdraw immediately.
- Promotions must be submitted to the Board as required by 58 Pa. Code § 813a.3.
- Operators must update their internal controls to describe how their interactive gaming system is configured to ensure compliance with these requirements.

Board staff are available to meet with operators to address any questions or concerns regarding the operational impact of this policy change. Operators planning to implement this policy by May 1, 2025, must submit their updated internal controls by April 16, 2025.

If you have any questions or would like additional information, please contact Paul Resch, Director of Gaming Operations, via email at presch@pa.gov, or Lee Copello, Director of iGaming Compliance Operations, via email at lcopello@pa.gov.

Sincerely,



Kevin F. O'Toole
Executive Director

KFO:pr

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Jennifer Heckert, Division Chief, PA Department of Revenue

Industry Guidance – 2025-02

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