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Delivered Via Electronic Mail

Mr. Jeffrey Yancey
Technical Compliance Project Manager (US)
PT Services (Delaware)
100 N. West Street, Suite 1200
Wilmington, Delaware 19801

RE: Playtech's Spanish 21 Waiver Request

Dear Mr. Yancey:

The Pennsylvania Gaming Control Board ("PGCB" or "Board") is in receipt of your correspondence regarding Playtech's regulatory waiver requests concerning Spanish 21. Playtech is asking to offer Spanish 21 as a live dealer variation in a scalable format. Specifically, Playtech has asked for a waiver relative to the following provisions under 58 Pa. Code §§:

- 635a.2(a), which provides that Spanish 21 shall be played at a table with betting positions for no more than seven (7) players.
- 635a.2(b), which outlines the information which must be included on the table layout or on a sign.
- 635a.11, which provides the rules and procedures governing the splitting of hands.
- 635a.12(c), which provides for additional fixed payouts when a player has a winning hand consisting of three 7s of the same suit, and the dealer's exposed card is also a 7.

Playtech has represented that it wishes to offer a Spanish 21 game in scalable, live dealer format, which would allow greater than seven players to play concurrently. Specifically, Playtech's proposed scalable Spanish 21 game would have all players utilizing the same seat/hand. Additionally, Playtech states that its intent is to allow players to re-split hands up to three (3) times, which would result in a player having four (4) hands in play. Further, Playtech has raised concern with placement of all information on the table resulting in the information being so small as to become illegible to patrons on their devices. Playtech proposes that the information would be easily accessible through readily visible links to patrons, consistent with how other interactive games direct patrons to help screens with game play information. Finally, Playtech seeks relief from the payout under 635a.12(c)(3), which provides a fixed \$50 to all other players when another player's hand consists of three 7s of the same suit and the dealer's exposed card is a 7 of any suit. Playtech proposes to add to the payouts under 635a.12(c)(1)-(2), by adding a payout of \$200 for wagers less than \$5, and only pay player's based upon their hand configuration.

After conversations between Board staff and Playtech, the Board has concluded that Playtech's first three requests relating to their proposed scalable live dealer Spanish 21 game will not require a regulatory waiver. PGCB allows live dealer table games to be offered in a scalable format (allowing the game to potentially have greater numbers of players) without issuance of a waiver. Additionally, for interactive (online) games, the Board allows information, including the information outlined under 58 Pa. Code § 635a.2(b) to be presented to patrons by usage of a click to access style of placement. Finally, Playtech's request relative to 58 Pa. Code § 635a.11 is unnecessary, as that section specifically states that an operator shall specify in its rules submission the number of additional times a patron may split a pair (see §635a.11(c)).

Relative to Playtech's final waiver request, relief from the additional fixed payouts, a waiver is granted as follows:

1. Playtech's proposed additional fixed payouts structure is granted. In the event that a player's hand is a triggering event of 635a.12(c) (a player's hand consisting of three suited 7s with the dealer's exposed card also being a 7 of any suit), Playtech shall payout the additional fixed payouts as follows:

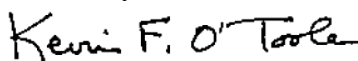
Player's original wager amount	Additional payout
Less than \$5	\$200
\$5 or more, but less than \$25	\$1,000
\$25 or more	\$5,000

2. Playtech's requested relief from 635a.12(c)(3)'s additional fixed payout of \$50 to all other players at the table is granted. As Playtech's proposed scalable format will see all players utilizing the same seat, the player's hands will be the same regarding the first three cards which are necessary to trigger 635a.12(c) additional payouts.

Therefore, Playtech may offer a scalable live dealer format Spanish 21 game, consistent with the rules, procedures, payout odds, and optional side wagers provided under Chapters 635a., and 635c. of the Board regulations. Implementation of the game shall remain subject to compliance with the usual Board procedures which precede the approval and launch of any new interactive game.

At such time that Regulations incorporating the waiver issued pursuant to this letter are adopted by the Board and published in the *Pennsylvania Bulletin*, this waiver shall become null and void. If you have any questions or concerns on this matter, please do not hesitate to contact Senior Counsel, Robert Wood, via email at [REDACTED].

Sincerely,



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
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB