

April 30, 2010

Richard Sandusky, Director of Regulatory Review  
Pennsylvania Gaming Control Board  
P.O. Box 69060  
Harrisburg, Pennsylvania 17106-9060  
Attention: Public Comment on Regulation #125-114

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 539. SIC BO**

- § 539.1. Sic Bo table; Sic Bo shaker; physical characteristics.

Part (c) number (3) of this section stipulates that Sic Bo layouts must be inscribed with "The payout odds currently being offered in accordance with § 539.6 (relating to payout odds)." Shuffle Master recommends that the payouts are not required to be inscribed on the layout, but instead allow the payouts to be displayed on a placard, sign or LCD monitor on the table.

- § 539.4. 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.

- § 539.7. 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 all three dice do not land flat on the bottom of the Sic Bo shaker after being tossed, the dealer shall call a "no roll" and the game must be voided so players may bet again." Shuffle Master recommends adding provisions that allow for voiding a game on electronic tables.

Sincerely,



Christopher Cook  
Product Compliance Technical Liaison