

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 #125-115

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 567. WAR

- § 567.2. War table; physical characteristics.

Part (c) number (4) of this section stipulates that War layouts must be inscribed with "The payout odds for a Tie wager and War wager." Electronic tables utilize the ability to change the table between Blackjack, Baccarat or War. This requirement would not allow an operator the flexibility to change between the games. 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.

- § 567.3. Cards; number of decks; dealing shoe.

Part (b) of this section calls for the use of a manual dealing shoe only and automatic dealing shoes or continuous dealing shufflers are often used with electronic tables. Shuffle Master recommends that the requirement is changed to "All cards used in War shall be dealt from a manual dealing shoe, automatic dealing shoe or a continuous dealing shuffler."

- § 567.7. 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.

- § 567.11. 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 a card reader device malfunctions, the dealer may not continue dealing the game of War at the table until the card reader device is repaired or replaced. If the card reader device is replaced then the game of War 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