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July 8, 2011

**VIA E-MAIL & FEDERAL EXPRESS**

Susan A. Yocum  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
P.O. Box 69060  
Harrisburg, PA 17106-9060

**RE: Public Comment on Temporary Rulemaking # 125-147**

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Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is the holder of a table games operation certificate and a Category 1 slot machine license, which authorize GGE to operate Parx Casino in Bensalem, Pennsylvania. GGE respectfully submits the following comments to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's temporary rulemaking, as captioned above, which was published in the Pennsylvania Bulletin at 41 Pa.B. 2952, on June 11, 2011.

The temporary rulemaking at issue amends the rules of the game for Craps, Minibaccarat and Baccarat. The rulemaking also amends Chapter 525 regarding table game internal controls to account for match play coupons. Specifically, the Board allows the use of match play coupons at table games if various audit procedures are created to accurately track the match play coupons ordered, received and distributed by a licensee.

The following list of comments addresses various sections of the Board's temporary rulemaking in relation to match play coupons. GGE offers these comments to increase the potential revenue for licensees and the Commonwealth as well as to compete with neighboring gaming jurisdictions, including New Jersey.

1. **58 Pa. Code § 525.21 (Match Play Coupons)** – Pursuant to prior discussions with Board staff, GGE reiterates its request to amend section 525.21 to explicitly allow the use of a system-based program for match play coupons. GGE requests that the Board include an additional provision to section 525.21 that allows licensees to use system-based software to create, generate, track and dispense match play coupons to our patrons. This provision would also recognize that physical inspections, inventory logs and other audit functions would be created and maintained in an electronic format.

This additional provision addresses both competitive concerns and asset protection issues. Currently, GGE's closest competitor in New Jersey offers system-based match play coupons that allow its patrons to simply walk up to a kiosk and printout the appropriate match play coupons at their own leisure. This customer-oriented approach allows patrons the ability to use the coupons on their own time frame and make it more convenient for our guests. From an asset-protection standpoint, the system-based program eliminates the need to store and regularly inventory match play coupons. Because all coupons are printed on-demand, there is zero concern regarding extra coupons in storage. As a result, GGE respectfully request that the Board add the following language to section 525.21:

***(q) A certificate holder may use an electronic, computerized system to create Match Play Coupons that meet the requirements in this section if:***

***(1) The computerized system satisfies the requirements of subsection (c) above in the creation of Match Play Coupons.***

***(2) The computerized system provides a functionally equivalent level of audit review to satisfy the requirements of subsections (d) through (l).***

***(3) The certificate holder provides in its internal controls the procedures governing the production, recording and subsequent reconciliation of the computer-generated Match Play Coupons, which must be submitted and approved by the Board.***

2. **58 Pa. Code § 525.22(d) (Match Play Coupon Use)** – GGE respectfully requests that the Board increase the number of match play coupons that a patron may use per wager from one (1) to two (2). While GGE recognizes the Board's rationale for this restriction, it believes there are significant unforeseen consequences. Match play coupons are a useful marketing tool for high limit table games. As such, high limit players would like to use multiple coupons on one wager for a larger payout. Under the current restriction, GGE would need to purchase and inventory numerous denominations to ensure that a high limit patron has the appropriate coupon for his type of game play. For example, a high limit player may want to use a \$1,500 match play coupon for a blackjack and midibaccarat hand. If he is limited to one (1) match play coupon, that player could not combine his \$1,000 coupon with another \$500 coupon. Moreover, GGE would need to ensure that it purchased a \$1,500 match play coupon and has one available in current inventory for the high limit player. GGE believes that the patron should have the option to decide if he wants to use one or two coupons for a wager. As such, GGE request that the Board amend section 525.22(d) by changing the one (1) coupon per wager requirement to a two (2) coupon per wager requirement.

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Pennsylvania Gaming Control Board  
Page 3

Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,



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Assistant General Counsel  
Greenwood Gaming & Entertainment, Inc.

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cc: Silvan B. Lutkewitte, III, Chairman, Independent Regulatory Review Commission  
Thomas C. Bonner, Esq.