



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

Midtown Building, Suite 400  
1301 Atlantic Avenue  
Atlantic City, NJ 08401-7212  
Tel 609 348 4515 Fax 609 348 6834  
www.foxrothschild.com

2782

RECEIVED  
SEP 21 2009  
MIDTOWN BUILDING  
ATLANTIC CITY, NJ

RECEIVED

SEP 21 2009

Eric M. Wood, Esq.  
Office Managing Partner

**Marie J. Gilletto**  
Direct Dial: (609) 572-2211  
Email Address: [mgilletto@foxrothschild.com](mailto:mgilletto@foxrothschild.com)  
File No.: 07599-00006

September 21, 2009

**VIA EMAIL AND FEDERAL EXPRESS**

Richard M. Sandusky  
Director of Regulatory Review  
Pennsylvania Gaming Control Board  
303 Walnut Street  
P.O. Box 69060  
5th Floor, Strawberry Square  
Harrisburg, PA 17101

**Re: Washington Trotting Association, Inc., License No.: F-1316**  
**Comments to Proposed Rulemaking 125-105**

Dear Mr. Sandusky:

Please be advised that we represent Washington Trotting Association, Inc. ("WTA"), a Category 1 slot operator licensee. On behalf of WTA, we are submitting the following comments to the Proposed Rulemaking No. 125-105, proposed amendments to regulations 58 Pa. Code § 465a.26(b) regarding Jackpot and Credit Meter Payouts.

The Pennsylvania Gaming Control Board (the "Board") provides an explanation of amendments to Chapter 465a, stating that 58 Pa. Code § 465a.26(b), former paragraphs (3), (4), and (5), renumbered as paragraphs (2), (3), and (4), were amended to give slot machine licensees greater flexibility as to who they may designate to act as a witness for jackpot or credit meter payouts of various amounts. As amended, the new regulations require that increasingly senior personnel verify jackpot payouts at certain thresholds. Currently, WTA's practice is that a slot floor person or higher verifies all jackpot payouts, but that as the jackpot amount increases, increasingly senior personnel are required to prepare and pay-out the winning jackpot.

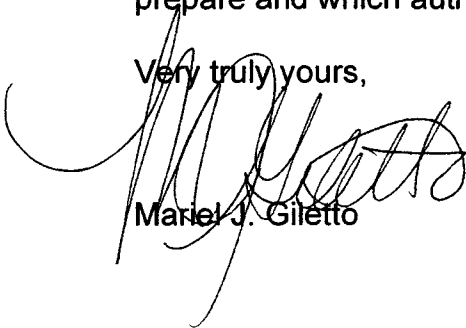


Fox Rothschild LLP  
ATTORNEYS AT LAW

Richard M. Sandusky  
September 21, 2009  
Page 2

Accordingly, WTA requests that the Board revise the subject proposed regulation to mandate the minimum levels of authority required for preparing and verifying a jackpot or credit meter payout slip, without specifying which authority level is required to prepare and which authority level is required to verify.

Very truly yours,



Mariel J. Gilletto

cc: Arthur Coccodrilli, Independent Regulatory Review Commission  
Guy Hillyer, Executive Vice President  
Michael S. Keelon, Manager of Compliance