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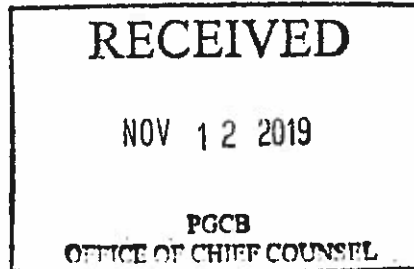
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October 30, 2019

VIA REGISTERED MAIL, RETURN RECEIPT REQUESTED

Mr. Chad W. Zimmermann, Assistant Chief Counsel
Attention: Regulation # 125-223 Public Comment
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Re: **Regulation # 125-223 Public Comment**

Dear Mr. Zimmermann:

This firm represents Bally Gaming, Inc. ("Bally Gaming"). We have reviewed Proposed Rulemaking No. 125-223 (Table Game Rules of Play; Over/Under, DJ Wild Stud Poker, Face Up Pai Gow Poker). As the owner of the intellectual property relating to Face Up Pai Gow Poker and a provider of gaming products and services in over 450 jurisdictions worldwide, Bally Gaming believes it can provide the Board with productive and constructive comments on the rulemaking to facilitate the games' success in the Commonwealth.

Specifically, we write to request an additional provision be incorporated within the proposed § 688a.12 (relating to payout odds; Progressive Wager configuration; payout limitation) so as to allow certificate holders to establish a maximum amount that is payable to a player on a single hand of at least \$50,000 or the maximum amount that one patron could win per round when betting the minimum wager. A model of such proposed provision drafted in a similar format to § 688a.12 of Proposed Rulemaking No. 125-223 is enclosed as Exhibit A.

As modeled, the additional provision brings the proposed rules in line with the standard practice found across jurisdictions that permits casinos to set a maximum payout in high payout games like Face Up Pai Gow Poker. For example, the Board codified similar provisions in the rules of Pai Gow Poker, Four Card Prime, Cajun Stud, Four Card Frenzy, and Mississippi Stud at

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§ 645a.13 (relating to payout odds; Envy Bonus; rate of progression; payout limitation), § 682b.12 (relating to payout odds; Bad Beat Bonus; payout limitation), § 683b.12. (relating to payout odds; payout limitation), § 684b.12. (relating to payout odds; payout limitation) and § 655a.12 (relating to payout odds; Envy Bonus; rate of progression), respectively.

We of course are prepared to revise the enclosed model provision at your request. Please do not hesitate to contact me should you have any questions or require further information.

Respectfully submitted,


Frank A. DiGiacomo

FAD
Enclosure

cc: Jacqueline Hunter, Scientific Games (*via email*)
Bo Zarach, Scientific Games (*via email*)

EXHIBIT A

I. § 688a.12. Payout odds; Envy Bonus; rate of progression.

(a) A certificate holder shall pay each winning Face Up Pai Gow Poker Wager at odds of 1 to 1, and shall not charge a commission or vigorish on winning hands.

(b) The certificate holder shall pay out winning Ace High Bonus Wager payouts at the odds and amounts in one of the following paytables selected by the certificate holder in its Rules Submission filed in accordance with § 601a.2 (relating to table games Rules Submissions):

Paytable 1

<i>Outcome</i>	<i>Pay</i>
Both dealer and player have ace high	20 to 1
Only dealer has ace high, with joker	10 to 1
Only dealer has ace high, no joker	8 to 1

Paytable 2

<i>Outcome</i>	<i>Pay</i>
Both dealer and player have ace high	40 to 1
Only dealer has ace high, with joker	15 to 1
Only dealer has ace high, no joker	5 to 1

Paytable 3

<i>Outcome</i>	<i>Pay</i>
Both dealer and player have ace high	30 to 1
Only dealer has ace high, with joker	15 to 1
Only dealer has ace high, no joker	6 to 1

Paytable 4

<i>Outcome</i>	<i>Pay</i>
Both dealer and player have ace high	25 to 1
Only dealer has ace high, with joker	10 to 1
Only dealer has ace high, no joker	7 to 1

Paytable 5

<i>Outcome</i>	<i>Pay</i>
Both dealer and player have ace high	40 to 1
Only dealer has ace high, with joker	12 to 1
Only dealer has ace high, no joker	5 to 1

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(c) The certificate holder shall pay out winning Fortune Bonus Wagers and Envy Bonus payouts at the odds and amounts in one of the following paytables selected by the certificate holder in its Rules Submission filed in accordance with § 601a.2:

Paytable 1

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	5,000 to 1	\$1,000
Royal flush + royal match	1,000 to 1	\$250
7 card straight flush with joker	750 to 1	\$100
Five aces	250 to 1	\$50
Royal flush	100 to 1	\$25
Straight flush	50 to 1	\$10
Four-of-a-kind	20 to 1	\$5
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	
Three pair	Push	

Paytable 2

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	8,000 to 1	\$5,000
Royal flush + royal match	2,000 to 1	\$1,000
7 card straight flush with joker	1,000 to 1	\$500
Five aces	400 to 1	\$250
Royal flush	150 to 1	\$50
Straight flush	50 to 1	\$20
Four-of-a-kind	25 to 1	\$5
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	

Paytable 3

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	5,000 to 1	\$3,000
Royal flush + royal match	2,000 to 1	\$1,000
7 card straight flush with joker	1,000 to 1	\$500
Five aces	400 to 1	\$250

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Royal flush	150 to 1	\$50
Straight flush	50 to 1	\$20
Four-of-a-kind	25 to 1	\$5
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	

Paytable 4

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	2,500 to 1	\$1,000
Royal flush + royal match	1,000 to 1	\$750
7 card straight flush with joker	750 to 1	\$250
Five aces	250 to 1	\$100
Royal flush	125 to 1	\$50
Straight flush	50 to 1	\$20
Four-of-a-kind	25 to 1	\$5
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	

Paytable 5

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	5,000 to 1	\$2,500
Royal flush + royal match	1,000 to 1	\$500
7 card straight flush with joker	500 to 1	\$250
Five aces	300 to 1	\$150
Royal flush	100 to 1	\$55
Straight flush	45 to 1	\$25
Four-of-a-kind	5 to 1	\$6
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	

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Paytable 6

<i>Outcome</i>	<i>Pay</i>	<i>Envy</i>
7 card straight flush	5,000 to 1	\$2,500
Royal flush + royal match	2,000 to 1	\$500
7 card straight flush with joker	1,000 to 1	\$250
Five aces	400 to 1	\$150
Royal flush	150 to 1	\$55
Straight flush	50 to 1	\$25
Four-of-a-kind	25 to 1	\$6
Full house	5 to 1	
Flush	4 to 1	
Three-of-a-kind	3 to 1	
Straight	2 to 1	

(d) The certificate holder shall pay out winning Progressive Payout Wagers and Envy Bonus payouts at the odds and amounts in one of the following paytables selected by the certificate holder in its Rules Submission filed in accordance with § 601a.2:

Paytable 1 (\$1 wager)	Pay
7 card straight flush	100% of meter
Five aces	10% of meter
Royal flush	\$500
Straight flush	\$100
Four-of-a-kind	\$75
Full house	\$4
Meter seed: \$10,000	
Rate of progression: 28%	
Original wager not returned to player	

Paytable 2 (\$1 wager)	Pay
7 card natural straight flush	100% of meter
7 card wild straight flush	10% of meter
Five-of-a-kind	\$500
Royal flush	\$300
Straight flush	\$100
Four-of-a-kind	\$30
Full house	\$7
Meter seed: \$10,000	
Rate of progression: 7%	

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Original wager not returned to player
Fully wild joker

Paytable 3 (\$1 wager)	Pay
7 card straight flush	100% of meter
Five aces	10% of meter
Royal flush	\$500
Straight flush	\$100
Four-of-a-kind	\$75
Full house	\$4
Meter seed: \$2,000	
Rate of progression: 29%	
Original wager not returned to player	

Paytable 4 (\$5 wager)	Pay & Progressive	Envy
7 card straight flush	\$5,000/100% of meter	\$5,000
Royal flush + royal match	\$5,000/20% of meter	\$3,750
7 card straight flush w/joker	\$5,000/10% of meter	\$1,250
Five aces	\$2,500	\$500
Royal flush	\$500	\$250
Straight flush	\$200	\$100
Four-of-a-kind	\$100	\$25
Full house	\$25	
Flush	\$20	
Three-of-a-kind	\$15	
Straight	\$7.50	
Meter seed: \$10,000		
Rate of progression: 1%		
Reserve rate: 1%		
Original wager returned to player		

Paytable 5 (\$1 wager)	Pay
7 card straight flush	100% of meter
Five aces	10% of meter
Five-of-a-kind	\$1,000
Royal flush	\$500
Straight flush	\$100
Four-of-a-kind	\$20

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Full house \$5
 Meter seed: \$5,000
 Rate of progression: 17%
 Original wager not returned to player
 Fully wild joker

Paytable 6 (\$1 wager)

	Pay
7 card straight flush	100% of meter
Five aces	10% of meter
Five-of-a-kind	\$800
Royal flush	\$400
Straight flush	\$75
Four-of-a-kind	\$10

Meter seed: \$2,000
 Rate of progression: 17%
 Original wager not returned to player
 Fully wild joker

Paytable 7 (\$1 wager)

	Pay
7 card straight flush	100% of meter
Five aces	10% of meter
Five-of-a-kind	\$800
Royal flush	\$400
Straight flush	\$75
Four-of-a-kind	\$10

Meter seed: \$1,000
 Rate of progression: 26%
 Original wager not returned to player
 Fully wild joker

(c) Notwithstanding the payout odds in subsections (a)—(c), a certificate holder may, in its Rules Submission under § 601a.2, establish a maximum amount that is payable to a player on a single hand. The maximum payout amount shall be at least \$50,000 or the maximum amount that one patron could win per round when betting the minimum wager, whichever is greater. Any maximum payout limit established by a certificate holder may not apply to Progressive Payout Wagers or Envv Bonus payouts.

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