

**PITTSBURGH PIRATES BASEBALL CLUB**

PNC Park at North Shore
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Pittsburgh, PA 15212

p. 412-323-5000

Laura R. Burd, Senior Counsel
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Via Facsimile (717-346-8350) and Regular U.S. Mail

Attention: Public Comment on Regulation #125-216

Dear Ms. Burd:

I write to you on behalf of the Pittsburgh Pirates (the "Pirates" or "Club") to offer comments on Pennsylvania's Temporary Regulation 58 Pa. Code Ch. 1401, General Sports Wagering Provisions (the "Regulation").

Sports betting in Pennsylvania will have a profound impact on the Pirates, not only on a local team level, but also on a larger league-wide level. To be sure, the widespread legalization of sports betting is going to affect every team in every league in every state across the country. Therefore, the Pirates appreciate this opportunity to provide our views on potential regulation in Pennsylvania and to endorse and support the comments separately submitted by Major League Baseball ("MLB") in collaboration with the National Basketball Association ("NBA") and the PGA TOUR.

As you know, the Pirates are a beloved pillar of the Pittsburgh community and of southwestern Pennsylvania generally. Our fans are passionate and loyal and we expect that many of them will welcome the opportunity to participate in a legal and regulated sports betting market in Pennsylvania. We strongly believe that Pennsylvania's sports betting regulations should protect our fans and other consumers, usher sports betting out from illegal underground markets to legal betting outlets, and safeguard the integrity of our games.

Maintaining the public trust in the integrity of our games is paramount. The potential regulatory language submitted by Major League Baseball would provide a strong framework for communication and information sharing between sports betting operators, Pennsylvania's Gaming Control Board, and sports teams. It would require important regulation of data and statistics used to offer and settle bets, and set up critical guardrail protections to protect sports integrity like restricting persons with inside information from betting and giving sports leagues a voice in identifying bets that pose too great of a risk to the integrity of the games.

We are very concerned the current iteration of the Regulation does not call for any portion of sports wagering revenue to be set aside to ensure the integrity of the sports on which the wagering is based. We believe an "integrity fee" is essential to fund programs educating our players, fans, and the general public regarding the potential involvement of unsavory characters and organizations




that may attempt to alter the outcome of these sporting events. The proceeds of this integrity fee would also allow teams such as the Pirates and leagues such as MLB to monitor betting lines and betting information internally.

On a local team level, the Pirates are obviously one of the handful of professional sports organizations that will be most directly affected by any new regulations in Pennsylvania. We think it is important to note that any revenue generated through sports wagering is largely dependent on organizations like the Pirates who actually supply the sports wagering product. Without professional sports there can be no professional sports betting. Providing a professional sports product is a costly endeavor. While our landlord is responsible for capital repairs and improvements at PNC Park, the Pirates are responsible for maintenance and operational expenses at PNC Park, which has consistently been named the premier ballpark in the country since its opening in 2001. The capital needs at PNC Park are significant and unfortunately are much higher than the current funds allocated to them by our landlord. We have been engaged in constant dialogue over the past five to seven years with city, county and state officials about the need to allocate a funding source to the capital needs of PNC Park. It stands to reason that a portion of the revenue collected from sports wagering should be allocated to the maintenance and capital upkeep of PNC Park and the other sports-based facilities in Pennsylvania which provide for sports wagering in the first place. We are concerned that no such provision is included in the current law or the Regulation.

For the reasons stated above, we respectfully urge you to adopt the suggestions made by Major League Baseball as well as our own requests for the Regulation to include an integrity fee and a fee to help maintain PNC Park for many years to come. These commonsense regulations will protect our team, our sport, and create a better sports betting marketplace for Pennsylvania consumers.

Thank you for your consideration.

Sincerely,


Frank Coonelly
President

Cc: Pamela Lewis- Secretary, Pennsylvania Gaming Control Board- via facsimile