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VIA ELECTRONIC TRANSMISSION

November 4, 2019

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Gentlemen:

Subject: Horse Racing Applications

This letter is in response to a request for public comment regarding a request by Plainridge Gaming and Redevelopment, LLC to conduct a 110-day live harness meet at Plainridge Park and Casino in Plainville, Massachusetts in 2020.

The Harness Horseman's Association of New England (HHANE) is fully supportive of the application provided a comprehensive independent inspection supported by facts and analysis is completed on the racing surface as soon as possible. The inspection is needed now so if it is determined that improvements are needed that work can be completed immediately after the 2019 racing season ends so the track will be ready for the 2020 racing season. We propose the inspection be completed by Coons Associates, the company who originally built the track. Coons Associates has built many tracks and is highly respected in the industry. Due to the importance of this matter, the HHANE has agreed to pay for the cost of the inspection.

The HHANE has had two meetings with the Massachusetts Gaming Commission (MGC) Director of Racing and Executive Director where HHANE expressed concerns regarding the track surface. Specifically, we all agreed the one-page letter dated April 1, 2019 by Dan Herbst did not include any support for the conclusion that "it is a very nice safe racetrack". The Board of Directors of HHANE and its membership have observed that the track in its current condition nearing the end of the 2019 racing season is lacking consistent and even surface material. The track cover material needs significant replenishment, so much so that the track base is showing through in areas.

Subsequent to our second meeting with the MGC, we queried various members of Harness Horsemen International (HHI) around the country to ask how management at their tracks would respond to concerns raised by horsemen and women. The response was that many tracks have a Drivers Committee and/or a Track Relations Committee that oversees the track surface. The consensus was that track management would immediately respond to any concerns brought to their attention. It was agreed by all that drivers concerns should be recognized as a safety issue.

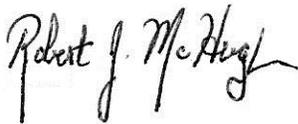
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The serious nature of this matter is reflected in a proposal by the USTA regarding the track surface. In recognition of the importance of maintaining a safe surface, the proposal has detailed requirements on track maintenance; failure to adhere to the requirements would result in a fine, suspension, or denial of an application for USTA membership. We are of the opinion that the independent review is needed to avoid a potential crisis and a public relations nightmare for Penn National Gaming, the Massachusetts Gaming Commission, the Commonwealth of Massachusetts, and the Harness Horseman's Association of New England, Inc.

We again are urgently requesting the Massachusetts Gaming Commission (MGC) view the track condition as a safety issue and consider the track evaluation as a license renewal requirement.

Respectfully submitted,

HARNESS HORSEMAN'S ASSOCIATION OF NEW ENGLAND, INC.

A handwritten signature in black ink that reads "Robert J. McHugh". The signature is written in a cursive, flowing style.

Robert J. McHugh
President