



February 5, 2018

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

Attention: Public Comment on Regulation #125-209

Dear Ms. Burd:

On behalf of IGT, I would like to thank the Pennsylvania Gaming Control Board (PGCB) for the opportunity to submit the following observations and suggested changes for consideration regarding Regulation #125-209 Temporary Rulemaking for the General Interactive Gaming Provisions [58 PA. Code CHS. 801-803] published in the Pennsylvania Bulletin January 6, 2018:

*Approval of Interactive Game Content* Based on our understanding, Interactive game content will be evaluated to the applicable slot machine regulations within *Chapter 461a. Slot Machine and Table Game Device Testing and Control*. While some similarities exist from a game content perspective (e.g., player understanding and game play integrity), there are several key differences which would not apply to interactive game content supplied directly to each player on their personally owned device as opposed to slot machine game content on a cabinet available for all players to access. As such, we suggest consideration for a waiver process for interactive gaming requirements (e.g., "461a.24 Waivers").

*801.2 Definitions. "Interactive Gaming Operator"* defines the conditions that require an entity to obtain an interactive gaming operator license but has added the following language which is different than what was adopted in the Act: "*through the provision of an interactive gaming platform*". We observe that the term "provision" could be interpreted to supply the interactive gaming platform which could only require an "Interactive Gaming Manufacturer License". As such, we suggest the following change for consideration:

*"Interactive Gaming Operator - A person licensed by the Board to operate interactive gaming or an interactive gaming system, ~~through the provision of an interactive gaming platform~~, on behalf of an interactive gaming certificate holder..."*

*801.2 Definitions. "Multi-Use Computing Device" (IV)* denotes that a Multi-Use computing device is approved by the PGCB. As a Multi-Use Computing device offers additional functions outside of the realm of authorized interactive games and may utilize commercially available off-the-shelf hardware, we suggest consideration for approval on only the items that are relevant to the authorized interactive game.

*802.2 Interactive gaming certificate petition and standards (a) (16)* requires that compliance certifications of the proposed interactive gaming devices and associated equipment are to be included

in the Petition process. Ideally, the petition for an interactive gaming certificate does not have to wait until all compliance certifications for the proposed products are available as that is traditionally a separate process where applicable certifications are obtained before offering products for wagering. As such, we suggest removal of (16) in the petition process to expedite the petition process and reduce complexity.

Should you have any questions or wish to discuss, please contact Carrie Porterfield (contact details below) or Robert Wood, IGT Product Compliance Regional Manager at Robert.Wood@IGT.com 609-742-0289.

Sincerely,



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cc: Robert Wood, IGT Product Compliance Regional Manager