



May 25, 2018

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

Attention: Public Comment on Regulation #125-213 & #125-214

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 #125-213 Temporary Rulemaking for the General Interactive Gaming Platform Requirements Subpart L Chapter 809 and #125-214 Temporary Rulemaking for Interactive Gaming Game Testing and Controls; Advertisements, Promotions and Tournaments; Live Studio both published in the Pennsylvania Bulletin April 28, 2018:

809.5 Access to equipment. (b)(3) states that remote access to an interactive gaming system is only permitted by employees of an interactive gaming certificateholder or an interactive gaming licensee with prior approval from and as limited by the Board. We observe that prior approval by the Board in advance of each remote access may delay the time to mitigate an issue, especially to resolve system outages after Board business hours. We suggest consideration of allowing remote access by authorized employees without prior notification with details of each remote access available to provide to the Board, if needed, with the following language change:

"809.5 (b)(3) By authorized employees of an interactive gaming certificate holder or an interactive gaming licensee ~~with prior approval from and as limited by the Board.~~"

809.6 System requirements. (f)(1) states that a petitioner for or holder of an interactive gaming certificate, an applicant for or holder of an interactive gaming operator license and an applicant for or holder of an interactive gaming manufacturer license must each seek Board approval of all source code used to operate interactive gaming in this Commonwealth. We observe that "source code" is provided as part of the approval process for critical programs used to operate interactive gaming and suggest consideration to the following language change:

"809.6(f)(1) A petitioner for or holder of an interactive gaming certificate, an applicant for or holder of an interactive gaming operator license ~~and~~ or an applicant for or holder of an interactive gaming manufacturer license must seek Board approval of all critical programs ~~source code~~ used to operate interactive gaming in this Commonwealth."

809.6 System requirements (f)(3) states that all software used to conduct interactive gaming shall be designed with a method that permits remote validation of software. As interactive gaming can consist of commercially available off-the-shelf software and software that is not relevant to critical interactive gaming functions, it is our understanding that remote validation performed by the Board is only applicable to critical control program software which was subject to prior Board approval. As such, we suggest the following language change:

"809.6(f)(3) All critical control program software used to conduct interactive gaming in this Commonwealth shall be designed with a method, approved by the Board, that permits remote validation of software."

809.7 Geolocation requirements (c) states that an interactive gaming certificateholder or interactive gaming licensee shall prevent registered players within a licensed facility from accessing authorized interactive games on the registered player's own computers or other devices through the use of geolocation technologies. Based upon the expansion of gaming within the Commonwealth, in addition to changes that occur in day to day licensee operations, we are concerned that the coordinates of prohibited locations (e.g., casinos, licensed truck stops, airports) will be subject to change and each location check may result in increased costs. As such, we suggest consideration to remove this requirement.

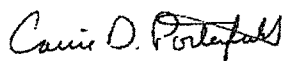
Chapters 809 and 810 included time constraints within several temporary regulations that are outside of operational best practices developed in other jurisdictions. IGT respectfully suggests these requirements would be better suited as policies rather than regulation in order to promote a positive player experience and interactive gaming system best practices. Suggested language for several items of concern are included below and IGT is available for further discussion based on our experience and expertise:

"809.6 System Requirements. (c)(4) An interactive gaming system must maintain all information necessary to recreate player game play and account activity during each player session, including any identity or location verifications, for not less than ~~6 years~~ a time period identified by the Board."

"810.11 Prohibitions (c) (3) Wagers associated with an incomplete game must be voided within ~~24 hours~~ a time period identified by the Board and the wagers can be forfeited or returned to the player provided that:"

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

Sincerely,



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cc: Heather Worner, PGCB Lab Manager
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