



Industry Support

Through the efforts of BMM working closely with GSA, the technical standards aspect of Class II has been well received. BMM has actually actively sought feedback from many members of the industry and used virtually all of these in the latest version of the Technical Standards document. Active participants are:

- Seminole of Florida – Charlie Lombardo and Lyle Bell
- NIGA – Mark Van Norman, Terry Poust (former NIGC commissioner)
- IGT – Sodak (John Chamberlain)
- SDG (Walt Eisele, Bob Luciano, Mike Karpchuk)
- MultiMedia
- C2 Gaming (Stephanie Maddocks)
- Nova Gaming (Dave Waters)
- Williams Gaming (Mark Pace)
- Konami
- Rocket
- GLI (Todd Elsasser)
- Gentings (Derrick Khoo)
- Unidesa (Antonio Martin flew out from Spain primarily for this meeting)

Letter of Support

The following is an Email, for distribution to all attendees, from Mr Lyle Bell:

Dear NIGC Technical Session Attendees,

Please find attached Version 1.08 of the Class II Technical Standards. Patrick Miller of BMM has done an excellent job of incorporating the recommendations made in our December 16 meeting as well as written suggestions received from Stephanie Maddocks (C2), Todd Elsasser (GLI), Walt Eisele (Bally/SDG) and John Chamberlain (IGT).

Version 1.08 was forwarded to Michael Gross at NIGC for their formal consideration of the revisions and translation into a format suitable for submission to the Federal Register. The Technical Standards and Classification Standards will appear separately in the Federal Register and are largely independent of each other.

Please review the changes (which are highlighted in markup format) and forward any additional comments to Courtney Roberts at GSA by Friday, January 28. Her e-mail address is croberts@gamingstandards.com.

I would like personally thank everyone for the time and effort put into this effort, especially the individuals mentioned above.

Lyle Bell

The NIGC is also relieved that the technical standards component has been so well received because that is the last thing they needed after all the complaints at the Classification Standards.

End Note: Palm Springs

The technical standards were discussed at the NIGC Advisory committee meeting in Palm Springs on January 13. Again there was little negative input and mostly positive support for the standards.

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NIGC Class II Definitions

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Executive Summary & Comments

Introduction

In 2004, BMM was selected by NIGC to create technical interpretations of the wishes and desires of the NIGC to create a "clear and crisp set of definitions of what constitutes a Class II game". This resulted in two NIGC documents:

1. Class II Classification Standards (i.e. when is a game a genuine Class II classification?)
2. Class II Technical Standards (i.e. what are the technical design considerations for Class II games?)

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The objectives were:

1. To create clarity and sufficient detail to make it less ambiguous for Class II manufacturers to comply with Class II definitions and technical guidelines, and to cater for new technology developments to be sensibly incorporated.
2. To streamline the process of classification and evaluation of compliant Class II games.

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Many people confuse the Classification Standards document with the Technical Standards document.

Main Differences

The main differences proposed between existing Class II games and those conforming to the proposed definitions are:

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1. Class II games will require the player to daub before he or she can claim any prizes (i.e. auto daubing will not be allowed).
2. The second release of numbers will just be sufficient for one instance (the first) of a game-winning prize (i.e. there will not be a multitude of game winners within the second release of numbers). If the game winner fails to cover (i.e. does not daub within 2 seconds), a subsequent release of numbers will occur to allow other game winners.
3. Bingo is a game which, by definition, necessitates competition among players. The proposed definition prescribes that there must be sufficient time allowed (up to 2 seconds delay) to allow for six players to participate, although as few as 2 players after the 2 second delay will suffice to begin the game.
4. NIGC's definition of the common game of bingo mandates that all players are playing for the same prize patterns with the same probability of winning. This could possibly change the implementation of current multi-line game implementations.
5. The game winning prize must be a minimum of \$0.01 or 20% of the bet amount, whichever is greater. Some existing games have trivialized the game winning prize (i.e. a fraction of \$0.01) to enable more flexibility in their pay tables.
6. Pull tab games must have a physical pull tab roll in the machine which determines the game outcome. For instance, an RNG is not allowed to determine a pull tab game outcome.

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Extract from the Executive Summary

The following are the first two paragraphs of the executive summary with the second the most poignant:

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The purpose of this document is to begin the dialogue necessary for the creation and adoption of minimum common technical specifications for Class II games played with "electronic, computer, or other technologic aids." There presently are no such standards. Technical regulations from other gaming jurisdictions are useful as models, but a degree of incompatibility exists among them. These standards, therefore, borrow as appropriate, but ultimately they attempt to strike out on their own to address the unique aspects of Class II gaming under the Indian Gaming Regulatory Act (IGRA).

In so doing, these standards attempt to provide the specificity needed to ensure that Class II games are fair, secure, reliable, and auditable. At the same time, the standards attempt to create a framework that welcomes and permits new technology rather than prohibiting it by default, as is the case in many jurisdictions.

New Technology

In support of this goal, the following are areas of newer technology that are supported by the standards. Naturally when there are new subjects, there will be more to say.

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- Downloadable games
- Execution from hard disk
- Wireless communications
- Cashless
- Ticket In Ticket Out
- Advanced memory devices
- Advanced architecture

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Document Length

The current length of the Technical Standards document is 89 pages. However, this includes a very large table of definitions. The "meat" of the document is 73 pages long.

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For comparison purposes, GLI-11 is 84 pages long and includes very few of the subjects contained in the New Technology area. GLI-22, regarding Bingo, is 66 pages long and again does not cover many of the areas of new technology.

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