

August 9, 2016

Mr. A.G. Burnett, Chairman
Nevada Gaming Control Board
1919 College Parkway
Carson City, NV 89706

RE: August 11 Workshop on Possible Amendments to NGC Regulation 5

Chairman Burnett,

I am writing regarding certain aspects of the July 7, 2016 draft changes to Regulation 5 regarding wagering accounts (Section 5.225). Unfortunately, prior commitments prevent me from attending the August 11th workshop, but I want to assure you my absence is not indicative of a lack of interest or concern regarding the potential impact of these regulatory changes in the area of responsible gaming.

In preparing these remarks, I have had the opportunity to review the comments offered separately by Harry Haggerty of Sightline Payments, in his August 9th letter to the Board. I would note for the record that I am one of the 'responsible gaming professionals' that he references having worked with over the course of the last two years as his company sought input into the development of a more responsible method of funding gaming accounts. I have also offered comment to the Board and Commission on prior occasions regarding use of debit cards at gaming devices, and on suggested improvements in required responsible gaming controls. For the sake of brevity, let me say that I concur with the concerns, questions and arguments raised by Mr. Haggerty in his letter regarding the potential use of debit or credit cards to fund gaming through the use of a wagering account. I will not restate all of the facts and previous testimony offered to the Board on these issues, but will ask that the Board give consideration to that information as well as Board and Commission members' own previous statements of similar concerns, as you move forward to consider these proposed changes.

I do wish to note an additional concern regarding the responsible gaming options stated in paragraph 19, which only references limits by the patron on the total amount of deposits made over a period of time. I would ask again that the Board take direction from the language *and spirit*, of Regulation 5.170 – Programs to Address Problem Gambling, which includes the following requirement in paragraph 2:

Each licensee shall post or provide *in conspicuous places in or near gaming and cage areas and cash dispensing machines located in gaming areas* written materials concerning the nature and symptoms of problem gambling and the toll-free telephone number of the National Council on Problem Gambling or a similar entity approved by the chairman of the board that provides information and referral services for problem gamblers.

The language in italics (emphasis mine) was not included in the regulation merely for the sake of suggesting physical locations for the written materials and HelpLine number. In 1998 when the regulation was adopted, these references represented the most common places where patrons would be taking a break in play to access additional funds for gaming. This is the original consideration of “time and diversion” as an important aspect of responsible gaming regulation and this continues to be an important aspect today – perhaps even more so with the increased speed of technology. It would seem that in 2016 as you adopt regulations, procedures and rules for wagering accounts that represent new options for patrons to access additional funds for gaming, some reasonable effort can be made to align the new responsible gaming options to be consistent with the existing standards and intent of Regulation 5.170. Paragraph 20 goes on to delineate an extensive list of information that must be included in the rules governing wagering account transactions and licensees must “conspicuously display” and “make available” those rules to the patrons. I would suggest that this is a simple and logical place to include information about problem gambling and the HelpLine number as required disclosures to the public. I would personally be happy to work with the Board and/or members of the gaming industry to draft appropriate messaging to convey this information in a concise and effective manner for this purpose.

Again, my apologies that I am unable to participate in the August 11th workshop. On behalf of the Nevada Council on Problem Gambling, thank you in advance for accepting and including these written comments for the record and for the Board’s consideration.

Respectfully,



Carol O'Hare
Executive Director
Nevada Council on Problem Gambling

When the Fun Stops...Help is just a call, or click, away.

24 Hr. HelpLine: 1-800-522-4700 www.WhenTheFunStops.org

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