



October 21, 2016

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

Dear Chairman Burnett,

Hope you are doing well. During a recent review of the amended Regulation 5, specifically Regulation 5.225, I noted some language that maybe should be revisited. In defining "wagering accounts" it appears that the focus is weighted toward interactive gaming. As the industry moves forward in technology, the use of electronic transfer of funds on and off the slot machines will continue to grow. Regulation 5.225 very specifically requires substantial identification information on all players including birth dates and social security numbers. While this is understandable for wagering from mobile devices, this may be a very limiting factor to apply the requirement to all wagering accounts.

Currently Scientific Games provides systems in South Africa for Sun International and Peermont. Instead of ticketing, they use either smart cards (Sun) or mag stripe cards (Peermont) to put funds on and off games. Cash can be inserted but there are no ticket printers. Combined these casino entities have around 20,000 slot machines and over 1 million wagering account transactions every week. They operate with two types of cards – cards linked to the player account and "day cards" which are anonymous. The day cards are similar to tickets in that if you lose them you have lost real money. The point of this example is that it is recommended to allow for the use of "day cards" for wagering accounts in Nevada. If NGCB has concerns about this type of feature, then potentially limiting the balances on day cards, subject to jackpots, or other added controls could be considered.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Doyle', written in a cursive style.

Tom Doyle  
Vice President of Product Management & Compliance (Systems)  
Scientific Games

cc: Jim Barbee, Chief, Technology Division  
Kelly Colvin, Chief, Audit Division