

Category	Section	Quote From Standards	Scientific Games Feedback
Wagering Accounts	5.225	General Comment	<p><i>As previously commented, SG recommends that provisions for the use of anonymous wagering account or “Day Cards” be considered. Details have been provided in the letter from Tom Doyle to NGCB dated 10/21/16 and additional details below:</i></p> <p><i>As the industry moves forward, it is expected that the use of electronic fund transfers will continue to increase. To support this trend, SG recommends that regulations allow for flexibility of technology while maintaining solid internal controls.</i></p> <ul style="list-style-type: none"> <li>• <i>Casino players are accustomed to the use of tickets for playing slot machines. Tickets are anonymous and not linked to a player’s identification. To ensure consistency, it is recommended that this regulation consider similar functionality.</i></li> <li>• <i>As the use of wagering accounts becomes more common the potential of mandating a Social Security Number for every player account could have an adverse effect on revenue.</i></li> <li>• <i>Anonymous wagering accounts have existed in the gaming industry for a long time.</i> <ul style="list-style-type: none"> <li>○ <i>The Bally MCC product operates globally in officers clubs for the military. Kiosks are used to insert cash and then the player receives a card to insert into the slot machines (EGMs) to download funds. Player ID not required.</i></li> </ul> </li> <li>• <i>Accounting systems today already provide the security necessary for anonymous and/or ID related accounts. For example:</i> <ul style="list-style-type: none"> <li>○ <i>Internal controls include the requirement for a PIN entry to do transactions. This is supported in most (if not all) systems currently.</i></li> <li>○ <i>All WAT (Wagering Account Transfer) meters are recorded by the EGMs and the system. For each EGM there is a full reconciliation between the meters (beginning and end of day), total of individual transactions, and comparison to the account activity in the CMS. All transactions include a transaction ID.</i></li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ <i>Player ID in the form of Social Security Number and other information is still required and obtained for all IRS W2G jackpots. AML (Anti-Money Laundering) rules are still enforced based on inserted currency and redemptions.</i></li> <li>○ <i>WAT electronic fund transfers require strong internal controls just like ticketing.</i></li> </ul>
Wagering Accounts	5.225.19(a)	<p>19. Responsible Gambling.</p> <p>a. Licensees shall ensure that, by August 1, 2017, its patrons have the ability, through their wagering account, to select responsible gambling options that include deposit limits establishing the amount of total deposits a patron can make to their wagering account within a specified period of time.</p>	<p><i>As previously commented, SG believes that greater flexibility can be achieved by allowing Operators to administer the wagering account or the responsible gaming component independently. Recommend changing as follows:</i></p> <p><i>“...shall ensure that, by August 1, 2017, -its patrons have the ability, <del>through their wagering account,</del> to select responsible gambling options <u>associated with their wagering account</u> that include...”</i></p>