



April 12, 2013

Via Electronic Mail selloyan@gcb.nv.gov

Sally P. Elloyan, Executive Secretary
Nevada Gaming Commission
1919 College Parkway
P.O. Box 8003
Carson City, NV 89702

Re: NGCB Notice 2013-20

Dear Ms. Elloyan,

Aristocrat Technologies, Inc. ("Aristocrat") appreciates the opportunity to provide comments on the NGCB Notice # 2013-20 regarding regulations concerning interstate agreements for interactive gaming and respectfully submits the following:

1. What topics should the Board and Commission consider putting in regulation relating to an interstate agreement on interactive gaming?

In drafting regulations relating to an interstate agreement on interactive gaming, the Board and Commission should ensure harmonization of taxation; strive to create a common set of regulatory standards; ensure integrity of all operators and providers; minimize onerous requirements or control over operations; ensure flexibility; allow speed to market and avoid regulatory fragmentation/ varying Product Compliance standards which would make product investment by platform operators difficult.

2. Should revenue sharing between signatory states to a compact be based on the location of where the wager originated?

Yes. Revenue sharing based on where the wager originated will allow for fair and equitable market growth, as states will retain control of their tax rates and therefore be more likely to join an existing compact thereby increasing liquidity and scale, which will benefit all members of the compact. The Canadian internet bingo and poker model across several Canadian Provinces and the US internet based Lottery for Powerball across states follow this model.

3. Should revenue sharing between signatory states to a compact be based on the location of the licensed interactive host?

No (for reasons stated in point two above). The profit pool of the interactive host will be taxed by the host state.

ARISTOCRAT TECHNOLOGIES INCORPORATED

7230 Amigo Street, Las Vegas, Nevada 89119 USA

Phone: (702) 270-1000 (800) 748-4156 Fax: (702) 270-1001 www.aristocratgaming.com

4. Should the regulatory body of the signatory state where the wager originated have control over player disputes related to said players?

While player protection is a fundamental duty of the regulatory body of each signatory state, the regulatory body of the location of the licensed interactive host should have control over player disputes in accordance with regulatory standards and requirements set forth and agreed upon by the signatory states to the compact, consistent with the common regulatory standards described in point one, above.

Aristocrat looks forward to working with the NGCB staff and industry representatives to finalize regulatory language regarding this exciting interactive gaming initiative.

I am available to discuss or answer questions at your convenience. I can be reached at (702) 599-6800.

Sincerely,



Atul Bali
President – The Americas