

May 11, 2021 Comments received from Caesars Entertainment on behalf of 888 Holdings

Good Afternoon.

Please see the comments below from 888 Holding in regards to the proposed Regulation changes.

- Remove provisions limiting online gaming to the game of Poker (5A.020 subsection 7)
 - o Is this in some way allowing online Casinos in Nevada?
- KYC – Request an ID document in addition to the existing electronic ID verification requirements (5A.110 subsections 2(a), 2(d))
 - o We believe that requesting an ID document in addition to the existing electronic ID verification via LN creates friction in the onboarding process. If the NGCB is interested in creating an additional “authentication” step (to ensure that the individual who provides the account details is actually the individual that owns these details), we can suggest other ways that may be acceptable for successfully authenticate individuals.
 - o Will we be able to use SSN4 in the new KYC process?
- Introducing a national SE scheme (requesting daily sync with the NGCB state-wide SE list) (5A.130 subsections 1, 4-6)
 - o We would like to get clarifications on the technical specifications for the sync process

Thank you.