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June 24, 2008

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2120 L Street NW, Suite 700
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RE: Report on Jurisdictions that Permit Bingo to be Played with Auto Daub

Direction

We have been asked to survey non-tribal bingo markets that currently allow the use of electronic bingo player aids which automatically cover the numbers or designations for the player after the numbers or designations have been determined (auto daub). It is important to note, while a jurisdiction may allow for the use of auto daub, it does not mean that the feature is in use in that jurisdiction.

Auto daub is a feature which eliminates the need for the player to manually enter each ball called into an electronic player device. As each ball is called, the player device will automatically mark any active cards with the matching spot. The auto daub feature is a program built into the player device software. In order for this function to operate, there must be a means of communications between the player device and the caller station. Each ball called must be transmitted to the player device by some electronic method.

Background of GLI

Gaming Laboratories International, Inc. (GLI) is the acknowledged world leader in gaming device and system testing. Established in 1989 as the first independent testing laboratory in the United States, GLI's growth has paced the industry as it has expanded its staff, level of experience, testing equipment and facilities. As the oldest private gaming testing laboratory in the world and the first of its kind in the United States, GLI currently provides over 300 approvals each day for gaming devices from more than 190 suppliers worldwide.

GLI is the only testing laboratory for the gaming industry in the United States accredited to the ISO 17025 standard (general requirements for the competence of testing and calibration laboratories) and ISO 17020 standard (general criteria for the operation of various types of bodies performing inspection). Earning ISO accreditation validates the quality of GLI services by placing GLI testing procedures under the scrutiny of quality standards

published and used internationally. ISO accreditation identifies GLI as an organization that governs itself with operational integrity and ethical standards in both business and technical competence. It also gives GLI a mandate to continually improve the level of service provided in order to maintain our status as accredited testing laboratory.

Through the years, GLI has gained the experience and expertise necessary to test all aspects of bingo technology. GLI tests and certifies electronic bingo equipment and systems for numerous gaming commissions, and state and provincial governments. GLI leads the industry in testing equipment submitted by all bingo suppliers, large and small. GLI also houses the world's largest dedicated electronic bingo test lab where engineers ensure the integrity, randomness, security, accuracy of accounting, and regulatory compliance. In addition, bingo testing is performed against the GLI-15 Electronic Bingo and Keno Standards that GLI has developed from rules and standards that have been adopted by each particular regulator.

Bingo System Overview

The game of bingo has greatly evolved from its early form to its current electronic style of play. Technology has changed the way the player experiences the game of bingo by making the game easier to play and more entertaining. The increased entertainment and faster paced games have evolved in an attempt to attract new customers and promote the popularity and growth of this game type. Some technological advances may include the addition of game management systems, player interfaces, and electronic player devices.

The introduction of game management systems and electronic player devices have allowed bingo halls to monitor the reporting of significant events, the collection of financial data, and the verification of winning bingo cards. The systems can contain many different sub systems which include a primary server, a ball server, and a point of sale.

The primary server normally controls the users who can use the system, security features, and will be used to set up the different bingo game schedules, games, winning patterns, and prizes. The primary server may also contain a database or other means of storing all historical data and transactions.

The ball server, also referred to as the 'caller station', controls the ball draw functions and card verification processes of each bingo game. Ball draws are accomplished in two ways, via ball mixing device or electronic random number generator (RNG). When using a ball mixing device, numbered plastic balls are cycled in a receptacle by a manual force, normally by turning the receptacle crank or by forced air. Balls are pulled from the receptacle, one by one, at a fixed interval and entered into the system as 'called balls' (in some systems the balls are entered by optical recognition). Once a ball is called the ball is displayed to the players on the bingo board, which contains a listing of all previous balls called. When using an electronic RNG the balls are replaced by software which will output a random set of numbers, again at a fixed interval. The numbers are the same as those printed on the balls, and are "shuffled" or randomized at the start of each game. When these balls are called, they are automatically marked as called, and displayed on the bingo board. Whether it is a physical ball draw or RNG call, the bingo numbers are transmitted to the player devices and the auto daub feature covers any matching numbers on the players' cards.

A point-of-sale station will be used to sell bingo cards and electronic hand held devices with cards on them to players in order to participate in bingo games. This device is very similar to a cash register. The point-of-sale communicates to the system during these sales and will then download the correct card packages to the sold hand held unit electronically. In many cases this is accomplished through an infrared connection between a docking station and a player device but can also be done using RF (Radio Frequency) or a hard-wired connection. The point-of-sale is configured to offer packages with commonly purchased groups of cards.

These system components have the abilities to monitor all financial transactions at each bingo location as well log each action performed by system users in log files. They can track electronic hand held units or player stations that are being used by players as well as keep track of what has been sold to them. When requested, the system can print reports on any financial data or system log for any period of time. In some jurisdictions which allow RF, or other means in which the hand held units can also notify the system when the player has hit the winning bingo pattern and has won the game. The ball draws for each game are also stored on the system for a set period of time and can also be displayed in reports as well.

Player Devices

Player devices come in many forms, but for simplification purposes will be categorized into two sections, Electronic Bingo Card Minding Devices (EBCMD) and fixed units.

The EBCMD are hand held, user friendly devices that assist players in playing the game of bingo and keeps track of one or more bingo cards at the same time and automatically covers called bingo numbers on each players bingo card when the auto daub feature is configured and enabled. They also allow the player to track significantly more cards than a player would be able to track if they were all paper cards. The devices are generally small units with a video display, with limited player inputs. The numbers are transmitted to the unit as they are called and the unit automatically marks the numbers on all available cards when the auto daub feature is configured and enabled. Generally the hand held device is designed to always display a player's card that has the best chance of obtaining a bingo. The hand held devices normally have different views, covering single card or different variations of multiple card viewing. The player can change the view, color or styles of their cards as they play the game with no effect on the outcome of the game. When a bingo is achieved the unit will alert the player.

Fixed units, in many cases, offer the exact same functionality as the EBCMD units. Normally these units are simply larger versions or large displays with the same or similar software. They are found semi permanently mounted to tables or desks and are used in permanent bingo halls or as standalone terminals.

Research

Based on our research and experience, the following non-tribal jurisdictions permit the use of the auto daub feature described above:

Jurisdiction	Auto Daub
Alabama	Permitted
Kentucky *	Permitted
Louisiana *	Permitted
Military **	Permitted
Mississippi *	Permitted
Nevada	Permitted
North Dakota	Permitted

*Gaming Laboratories International Inc. has tested bingo devices for this jurisdiction.

**Please note, based on our research the Army is in the process of drafting new regulations. Regulations referenced could not be found for review.

Alabama

As outlined on the Alabama Attorney General website, "Bingo is legal in Alabama in a number of counties that have adopted a constitutional amendment authorizing bingo for charitable purposes to be conducted by the charity itself and, in general, this is overseen by the Sheriff of each County or the Chief of Police of a city such as Jasper that has an independent constitutional amendment authorizing Bingo." The below listed counties in Alabama have adopted the following amendments:

County or City	Amendment Number
Jefferson	386
Madison	387
Montgomery	413
Mobile	440
Etowah	506
Calhoun	508
St. Clair	542
Walker *	549
City of Jasper	550
Covington	565
Houston	569
Morgan	599
Russell	612
White Hall *	732
Green *	743
Macon *	744

*Although GLI has not tested devices for Alabama, based on our field observations on the indicated counties, we have observed devices configured and in use to utilize the auto daub feature.

Kentucky

As outlined in Kentucky Regulations 820 KAR 1:001, § 1, item 18, "Covered' is defined as being daubed or smeared with indelible ink if using a disposable paper bingo face, or marked electronically if using a card-minding device." Kentucky rules and regulations are silent on the topic of Auto Daub and do not specifically state that that the player must manually mark the cards or that Auto Daub is prohibited.

In addition, Kentucky allows for both the hand-held and fixed-base card minding devices. Kentucky Regulations 820 KAR 1:001, § 1, item 18 and 35 defines the hand-held and fixed-base card minding devices as a "computer system, not necessarily manufactured by a licensed manufacturer, which has been loaded with proprietary software by a licensed manufacturer to enable it to function as a card-minding device."

Lee Crawley of the Charitable Gaming Office in Kentucky has confirmed to Gaming Laboratories International Inc. that auto daub can be configured and is currently in use in Kentucky.

Louisiana

Louisiana Administrative Code Title 42:1 § 1817 defines the game of bingo as the "game of chance played for prizes with cards bearing numbers or other designations, five or more in one line, the holder covering numbers, as objects, similarly numbered are drawn from a receptacle and the game being win by a person who first covers a previously designated arrangement of numbers on such a card." Additionally, Louisiana allows for the hand-held and fixed-base card minding devices.

Louisiana Administrative Code Title 42:1 § 2101 defines Electronic Bingo Card Dabber Devices (EBCDD) and systems as "any electronic or computerized devices and related hardware and software that is utilized to conduct a game of bingo." According to § 2105 the "EBCDD must only offer play for the game commonly known as bingo and must also be programmed to automatically erase all electronic bingo cards and/or bingo card face numbers that were stored in the device upon turning off the devices after the last bingo game of each session or be some secondary timing or clearing method."

Louisiana Administrative Code Title 42:1 § 1803 defines Electronic Video Bingo as "a machine designed for the specific purpose of playing the game of bingo except that an electronic random number generator may be utilized to select numbers in lieu of the drawing of numbers from a receptacle and that one or more video images containing numbers or other designations five or more in one line may be utilized instead of a card." In most cases devices in use under this rule are standalone bingo devices. These machines play bingo on a small card on the main screen or on a secondary screen, and display the outcome as a spinning reel game. Devices contain an internal RNG, and require no player interaction other than the necessary steps to initiate a game.

Gaming Laboratories International Inc. has tested a number of devices for use in Louisiana, and all are known to be used in the field with auto daub enabled.

Military

Based upon our review, bingo played in conjunction with auto daub is permitted on a number of military bases. However, we have not conducted an extensive review of all military bases. The following information has been confirmed:

Contact	Location	Device & Configuration
Edward Jackson	Electronic Bingo Fort Bragg, NC (910) 396-3310	<ul style="list-style-type: none">• Lil' Champ – Auto daub enabled• 24 Number Bingo or Planet Bingo handhelds – Auto daub enabled
Sue Harmon	Video Bingo Fort Benning, GA (706) 544-1964	<ul style="list-style-type: none">• Keyless – Auto daub: “Press ‘Enter’ to automatically fill in numbers”
Mary Russel	Redstone Lanes Bowling Center Redstone Arsenal, AL (256) 842-2695	<ul style="list-style-type: none">• Planet Bingo – Auto daub enabled

Mississippi

Sonny Weathersby, Mississippi's Director of Charitable Gaming, was contacted and has informed Gaming Laboratories International Inc. that auto daub is a configurable option and is allowed only on fixed base units because this jurisdiction does not permit the use of radio frequency communications to the EBCMD's.

Nevada

Nevada is silent on the topic of auto daub. Although this jurisdiction is not tested at GLI, we know that they have configurations within the bingo software in which a location can enable or disable the auto daub feature. We cannot determine if the software in this jurisdiction is currently configured in this manner and therefore cannot make an assumption of how each game is presented to a bingo player. We do know that there are no specific rules that state that auto daub is prohibited in Nevada.

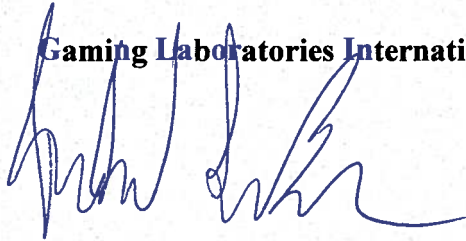
North Dakota

North Dakota Administrative Code Article 99-01.3-04-03 §11J dated October 1, 2006 states that "a player may use an input function key on a device or an organization may use a radio frequency signal to mark each number as it is called. When a player inputs a number or an organization sends a radio frequency signal, a device may automatically mark all the player's cards that contain that number." Tracy Bigelow, an auditor with the gaming division under the office of the Attorney General, has informed Gaming Laboratories International Inc. that auto daub may be configured and used in the field.

Should you have any questions regarding any of the information contained in this letter, please feel free to contact my office.

Sincerely,

Gaming Laboratories International, Inc.



Richard LaBrocca
Director of Engineering
Lottery & Bingo Testing

JPV/nc

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