

GSA/NIGA NIGC Technical Session

Minutes –12/16/04 – Mandalay Bay, Las Vegas, NV

Attendees

Roy Johnson, Agua Caliente Gaming Commission
Philip Orosco, Agua Caliente Gaming Commission
Bob Luciano, Bally Gaming & Systems
Leonard Bowman, Bear River Band
Patrick Miller, BMM Test Labs
Drew Pawlak, BMM Test Labs
Greg Cervantes, Cabazon Nation
Paul Slama, Cabazon Nation
Damon Jones, Chickasaw Nation Gaming Commission
Alex Martinazzi, Colusa Gaming Commission
Stephanie Maddocks, C2 Gaming
Derrick Khoo Sin Huat, EGenting
Todd Elsasser, GLI
Michelle Olesiejuk, GSA
Courtney Roberts, GSA
Steve Osbourne, Hobbs, Straus, Dean & Walker
Teri Poust, Holland & Knight
John Chamberlain, IGT
Sue Carletta, IGT
Thomas Goldschmidt, Konami Gaming
Sherry Rodriguez-Mata, La Jolla Gaming Commission
Jennifer Bliss, Monteau & Peebles
Matt Haga, Multimedia Games
Skip Lannert, Multimedia Games
Mark Van Norman, NIGA
Michael Gross, NIGC Office of General Counsel
David Waters, Nova Gaming
Andrew Masiel, Pechanga Indian Reservation
Ted Grav, Rocket Gaming Systems
Walt Eisele, SDG
Rob Miller, SDG
Lyle Bell, Seminole Tribe of Florida
Charles Lombardo, Seminole Tribe of Florida
Antonio Martin, Unidesa Gaming & Systems
Mark Pace, WMS Gaming

Called To Order

Lyle Bell, Seminole Tribe of Florida, called the meeting to order at 8:40am.

Agenda

NIGC Document Review

- Encryption
- Disaster recovery issues and critical memory
- Meters, including multi-game
- Event storage and logging
- Formal Application Configuration (FAC)
- Process Flows
- RNG
- Section by section review

Issues for Discussion

Welcome

Lyle introduced himself and thanked the group for their participation in today's meeting.

Teri Poust, Holland & Knight, welcomed everyone on behalf of NIGA.

Lyle stated that the goal today is to review the technical standard, with focus on the sections where comments have been made. We would like to discuss each issue and share a consensus on what changes this group recommends to the NIGC. The agenda is to discuss encryption, disaster recovery issues and critical memory, meters, event storage and logging, formal application configuration, process flows, and RNG. After these areas are addressed, we'll then go through the document section by section and discuss individual comments on those sections to discuss.

Michael Gross, NIGC Legal Counsel, made clear that this meeting is not sponsored by NIGC. He is here to listen and learn and to give the group's recommendations to the advisory committee. The committee wants to issue a new draft as of February 1. The formal process will allow further input as well. He appreciates that people have taken the time to attend and welcomes everyone's comments. He noted that BMM is their contractor for the writing of the technical standards.

Lyle additionally noted that BMM is here as a GSA member and as the contracted technical writer for NIGC. The statements of GSA, NIGC, and BMM do not necessarily reflect the opinion of the other.

Lyle noted NIGA and GSA are sponsoring this event. The intention is not to push any one entity's standards or protocols, simply to gather input from the gaming community.

Charles Lombardo, Seminole Tribe of Florida, speaking as a member of the advisory committee, noted that most committee members are not well versed in these areas and much of the progress will be made from your comments. Thank you for your input.

Encryption

There was concern that the level of encryption is excessive and that it would prevent some vendors from delivering a solution that could meet the standard. There are some existing protocols that would not conform to the document as is. As an example, SAS would not work because it isn't encrypted.

For the section, Password Transmission 2.1.2 (7), the consensus is that password transmission can be left as is in the document.

For the section, Key Data Files 2.3.2, the consensus is that it can be left as is.

For the section, Cashless Transactions 4.5.5.5.1 (1A, 1B), the section should be removed.

Action: Walt Eisele, SDG, and Skip Lannert, Multimedia Games, will take section 6.6.1 (Encryption and Hashing) and rework. The reworked section will include the language in 2.6.1. They will send their completed rework to GSA next week to be distributed. Part of the rework will include different types of encryption, to include all that are currently being used in the industry.

Disaster Recovery Issues and Critical Memory

For the section, Failure/Recovery Scenarios 2.7, the consensus is to remove the example in 2.7.2.1.

For the section, Downloadable Software/Games 2.10, the consensus is to add "master meter set and critical data" to 2.10.6.

In sections 2.10.2, 2.10.7, and 2.10.9, replace the word "should" with "must".

For the section, Critical Memory Requirements 3.9, the consensus is to leave it as is.

For the section, Memory 4.1, the consensus is to adjust subsection 1 to read, "critical memory, which may be stored on the client or a server."

For the section, Checking Corrupted Memory Before and After Game Play 4.1.3, the consensus on subsection 1 and 2 is to delete “has its own unique verification methodology” and add “each partition is verified independently”.

For the section, Meters 4.2.1.2, the consensus is in section 4.2.1.1, make the digit count a minimum of 8 digits for the meters and add language that requires there be no corruption of data when a meter rolls over.

For the section, Self Audit Error Checking 4.2.5, the consensus is to delete the entire section.

For the section, Modification of Parameters and Progressive Jackpots 4.18.2.2, the consensus is that the section is fine as is.

For the section, Critical Memory Resets 4.23, the consensus is that, “and/or using another authorized and secure means” should be added.

Action: John Chamberlain, IGT, will clarify section 6.7 (Failure Modes and Recovery) on what portions of memory need to be checked after a failure.

Meters, Including Multi-Game

For the section 4.14.3, change the text to, “The following meters are required for each pay table: ...”

Action: John will fill in the remainder of the text.

Event Storage and Logging (2.1.3.5)

It was the consensus that data needs to be stored online (on server) for a minimum of 7 days. It is up to the individual tribes as to archiving of data.

Formal Application Configuration (FAC) 2.12.1

The consensus is that this needs to be changed so it is not a single implementation. It needs to clearly identify anything that’s changed, missing, or extra.

Action: Todd Elsasser, GLI, will do this.

Process Flows (4.3 to 4.7.4)

The consensus is to leave this as is.

RNG (section 5)

The consensus is to leave this as is.

Mark Van Norman, NIGA, is concerned with this being technology forcing. There should be a phasing or grandfathering time and there should also be some kind of variance method. If a tribe has their own methodology of technology, they must still be able use this standard. Additionally, flexibility should be added in.

Lyle referenced that in Section 1.2, it details that the standard isn’t trying to mandate the solution or limit the technology; it’s just trying to move things forward.

Patrick Miller, BMM Test Labs, said we discussed this issue earlier in the day with regards to encryption. It was noted that we will add types of encryption, and note that they are not limited to just those and that as new methods are developed, they can be used as well.

Lyle noted there is enough room for interpretation that they should be able to meet the standard. He doesn’t think that it should be noted in the standard that it’s okay to not meet the standard.

Mark stated his concern is if you run into some new situations, there needs to an allowance for that.

Stephanie Maddocks, CZ Gaming, noted to Patrick that there is a timeline in place.

Michael said nobody has the intention of mandating this by a certain date.

Teri asked if these issues are in two documents or just one.

Michael noted that the technical intention was that everything would be put together.

Teri asked about the grandfathering time, and would there be a need for something like that.

Michael agreed that there needs to be a date with consideration.

Lyle stated he doesn't think this standard is going to limit forward progress. He believes the concern is that existing games may not meet the standard.

Bob Luciano, Bally Gaming & Systems, said he thinks the intention of everyone here is that everything we currently know is incorporated in this document. The concern is what we don't know, what's here in 5 or 10 years. He thinks the comments being discussed are appropriate and that there will need to be clauses that note these issues will be addressed later. Throughout time, the gaming industry has always lagged behind the rest of the world because of the regulatory framework. We have pretty good comfort over what is going to happen in the near future. However, beyond that, no one knows what will come so we will address the issues as they arise.

Section by Section Review

Lyle asked that if you have an issue as we go through the document, please do speak up.

David Waters, Nova Gaming, asked why there is a need for a load requirement in a technical standard. There has never been a load noted in the past.

Patrick noted that he has had experience in the past where problems began with the load size. In his experience, it has been valuable information to have.

In regards to Section 2.6.3, Todd addressed the phrase, "guaranteeing delivery." He noted that this should be an optional requirement. The wording concerns him.

Lyle said you could only guarantee delivery of critical data.

Todd said he was more interested in the language used.

Action: Todd will wordsmith the communications protocol requirements.

David brought up the error rate of 10 to the 5 in Section 2.6.5. He wants to know where that rate came from because currently there is no system that can run that

Bob said asked what it should be configured to.

Skip said if we leave it as written, every system will fail.

Todd agreed the number is a bit high.

Patrick wants to state something about there being no integrity issues.

Todd stated that figure should depend on the amount of machines on a floor.

David said an error condition is not going to cause invalid progressives. It is valid to keep data integrity and the idea behind it, but it must be reworded. It should be changed to read, "There is no degradation of data integrity."

The question of Section 2.8 being removed was raised.

Patrick said that most of the information has been moved to Section 6.8 so we really need to look at that to know.

Lyle asked what a firestorm oriented attack is.

Patrick noted that this is currently going on in the online gaming arena, where servers are being flooded.

Dave noted that the Section 6.8.2.e, it needs to note that SSID should not be broadcasted.

Patrick noted that for Section 6.8, wireless experts would say this section is not complete. He would like the committee to go to wireless experts and ask them to review.

For Section 2.9, Patrick said this was discussed at the Oklahoma City meeting, and then was discussed the next day at the advisory committee level. He has not had time to make changes the committee agreed on. He will add that in emergencies there will be fixes available.

Lyle's main concern is that in emergency cases, there should be assistance. Down in Australia, Patrick said he couldn't do emergency fixing.

Bob said we have to deal with emergencies; people will violate the protocol otherwise.

Todd suggested storing procedures.

Lyle mentioned he thought this issue is considered in the FAC.

Todd said it isn't.

Lyle's other concern is that things that are fixed may not affect game performance. He doesn't want to wait for lab authentication again if it doesn't affect the outcome of the game or how it operates.

David said even if it is immaterial to the actual game, the way it is written you must have authentication.

Patrick said the subject was discussed at the committee the day after the Oklahoma City meeting and the five regulators said they didn't want to see those things, the operators did.

Michael stated that if there is a software change before the lab approves, it is up to the gaming commission to approve it.

Lyle said that is correct, it is the Indian Gaming Regulators who are responsible. He wants to get rid of "by a test lab" in the section.

Patrick said that this section will be amended.

Lyle said the language should be, "upgrades are only permissible upon review and approval by the relevant tribal gaming authority."

The meeting attendees agreed.

In Section 2.11, Software Version Control, Patrick said as a test lab, he will provide the tools to test the software. Otherwise, he has to test the tool the company provides as well. If he has to buy it, then he doesn't have to verify it. From GLL's perspective, if you provide the tool, they won't use it to test. He suggested using the language, "upon request from the test lab", in items 2, 3, and 4.

The meeting attendees agreed.

Todd also mentioned Section 2.1.1.

Michael said it was noted, and then not added in to the document. It will be.

For Section 3, Bob said 3.1.1.3 will be deleted.

For Section 3.3.2, Todd said that "when the door is open" needs to be defined more clearly.

Action: Mark to look into section 3.3.2 and changing the language. He will look for term advice and adjust the language.

Michael said in regards to Sections 3.4 and 3.5; people have said we don't need this.

David added that in Section 3.6.1, there is no way to test against this. For example, "machine noise being too high". It is too subjective to test.

Patrick agreed.

Sections 3.6.1, 3.6.4, and 3.6.5 will be removed. Sections 3.6.2 and 3.6.3 will be kept as is.

It was noted to the attendees that if you have a concern and would like to keep 3.6.4 or 3.6.5 in the document, you may submit your comments and the matter can be reconsidered.

Skip said Section 3.12.3.2 regarding switches seems too broad. "Are not permitted" will be removed and, "must be capable of being sealed" will be added.

For Section 3.13.1, delete 1 and 2, and note that it requires UL testing.

For Section 3.14.1.1.4, remove second sentence.

For Section 4.4.1.6, delete "or hard meters", and add item 7 for the belly door.

For Section 4.4.3.1, add "a message stating the door(s) has closed must be displayed for either a preset period or until the next game play."

For Section 4.7.5.2, remove "prominently".

For Section 4.8, remove "of bingo or pull tab" and replace with "game results".

For Section 4.9.5.4, remove "or be available as a menu or help screen item".

For Section 4.9.6, should be "or OTHER input device".

For Section 4.9.8.1, the second sentence should be changed to "when playing at the lowest percentage available".

For Section 4.9.8.2, the second sentence should be changed to "when playing at the highest percentage available".

For Section 4.9.7.2, delete "bingo/pull-tab result" and change to "game result".

Sections 4.13, 4.15, 4.16, 4.17, and 4.6.6.2 all need to be in the classification standard.

It was noted that all sections that apply to a classification standard will be noted and moved to that document.

Remove Sections 4.22.1.1, 4.22.1.2.1, and 4.25.

Section 8 needs changes made to the language.

Action: Stephanie to rework all of Section 8.

Section 7.2.10 needs to be moved into a classification document.

Delete Section 9.1.1.3.

Action: Michael and Patrick to work on definitions in appendix.

Closing

Patrick informed the meeting attendees that these changes will be incorporated into the new document and a new version will hopefully be ready by January 1. The committee welcomes any additional comments you may have on the next revision.

Patrick and Michael expressed their sincere thanks to the meeting attendees for their input.

The meeting adjourned at 5:25pm.