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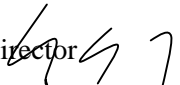
Larry Gregory
Executive Director

MISSISSIPPI GAMING COMMISSION

Post Office Box 23577
Jackson, Mississippi 39225-3577
(601) 351-2800

INDUSTRY LETTER NO. 2004-09
October 19, 2004

TO: All Licensees, Enrolled Attorneys and Interested Parties

FROM: Larry Gregory, Executive Director 

RE: Equipment Testing by Independent Test Laboratories

This industry letter replaces and supersedes all prior letters/memos related to this subject matter and specifically replaces an Industry Letter dated February 26, 2004 entitled "Regulation Amendments; Testing of Ticket In/Ticket Out Systems."

Effective immediately, the Mississippi Gaming Commission (MGC) is authorizing the use of independent test laboratories (ITL) to perform evaluations on slot machines, slot systems, and other limited associated equipment as described within this letter. All parties submitting any of these items for review have the option to submit to the Mississippi Gaming Commission Laboratory or one of the independent test laboratories approved by the commission. Submissions already sent to the MGC Laboratory can be withdrawn and submitted to an ITL as long as the manufacturer submits a written request for the withdrawal to the MGC and the removal of any items from the MGC lab is coordinated with the MGC staff.

Our intentions for utilizing ITLs are to relieve some of the increased workload on the MGC Laboratory and accelerate the submission and review process without sacrificing the quality of work and technical knowledge necessary to adequately review these submissions. The MGC intends to bring all testing back in-house when deemed appropriate.

The manufacturer shall be solely responsible for payment of all testing fees directly to the independent lab. The fees to be charged shall be determined solely between the manufacturer and the independent lab. The MGC will not be involved in resolving any fee disputes between the manufacturer and the independent lab.

The information provided in this letter will identify the requirements and procedures that must be followed. **Any variations to these requirements must be requested in writing and receive MGC approval prior to implementation.** If you have questions regarding any of the requirements within this letter, please call the applicable phone number referenced under the "Points of Contact" section.

ITL Licensure Requirements

ITLs must be approved by the MGC and registered with the Mississippi Secretary of State's office before they can evaluate any Mississippi submissions. ITLs must also submit an application for licensure within 30 days of approval by the MGC to perform tests. Corporate and personal investigations will then be scheduled and if, upon completion of the investigations an ITL is denied a license, they must immediately exclude themselves from receiving all Mississippi submissions. Any submissions currently in their queue must be returned to the

manufacturer for resubmission elsewhere. Applications for licensure can be found on the MGC web-site at www.mgc.state.ms.us.

Authorized Test Laboratories

BMM North America, Inc., Gaming Laboratories International, Inc., and Nick Farley and Associates are the three ITLs currently approved to receive submissions for review. If a manufacturer wishes to use another test lab, the manufacturer and test lab must contact the MGC Executive Director for approval.

Reviewable Items

Manufacturers are allowed to submit the following items to any MGC approved ITL for review.

GAMING MACHINES

Independent testing of the following game components is limited to 90 days from the date of this letter, except for testing of electronic companions to Bingo, which can continue until further notice.

- New Game Platforms (Hardware and Software)
- Hardware Retrofits to Approved Machines
- Random Number Generators
- Game Interfaces to Approved Systems
- Communication Protocol Verifications
- Software Version Control
- Ticket In/Ticket Out Functionality
- Games – including
 - Rules
 - Pay Tables
 - Artwork (glass, help screens, etc)
 - Correct Play / Pays
- Hardware Components / Peripherals – including
 - Printers
 - Coin Validators
 - Bill Validators
 - Hoppers
 - Card Readers
 - Video Monitors
 - Touch Screens
 - Mechanical Reels
 - Top Box Displays / Reels
 - Power Supplies
- Any electronic companion to Bingo

SLOT MONITORING SYSTEMS

Independent testing of the following slot monitoring system components is allowed until further notice.

- Gaming System Functionality – including
 - Ticket In / Ticket Out
 - Monitoring / Reporting of Revenue and Events

- Meter Readings
- Jackpot / Fill Processing
- Cashiering Functions
- Player Tracking
- System Components
- System Interfaces
- New Peripherals
- Cashless Gaming
- Software Upgrades / Modifications (new versions, new functionality)
- Software Version Control
- Progressive Jackpot Support / Implementation
- Communication Protocol Verification to all System Components
(e.g. local controllers, interface cards, EGMs)

OTHER EQUIPMENT / SYSTEMS

Independent testing of the following equipment and systems is allowed until further notice.

- Kiosks
- Hard Count / Soft Count Devices
- Table Game Systems
- Cage and Credit Systems
- Wireless Devices
- Wide area / multi site progressive systems
- Progressive Display Equipment
- Bingo Systems
- Keno Systems

Regulation Compliance

All submissions reviewed by an ITL must comply with MGC Regulations, including, but not limited to, Regulations IV & VIII. Any questionable interpretations of these regulations by an ITL must be disclosed in the submission Evaluation/Certification Report.

Forms

The forms listed below are the required submission forms all manufacturers must use when submitting items for review. These forms are located on the MGC web-site under the Gaming Lab options.

Gaming Machine Submissions

- Gaming Device Software Modification Request
- Gaming Device Hardware Modification Request
- Gaming Device Hardware Request
- Gaming Device Software/Hardware Deficiency Report
- EGM Cashless Verification Submission Form

Slot Monitoring Systems and Other Equipment / Systems Submissions

- Associated Equipment Submission Form

Certification Letter

The Certification letter must accompany every submission. Only persons found suitable by the Mississippi Gaming Commission and knowledgeable of the submission are authorized to sign the Certification letter. This letter is also located on the MGC web-site under the Gaming Lab option.

Points of Contact

Questions regarding gaming machine submissions should be directed to the Mississippi Gaming Commission Laboratory at (228) 432-8267. Questions regarding all other submissions should be directed to the Compliance Staff Officer at (601) 351-2932.

ITL Submission Procedures

1. Upon receipt of a manufacturer submission, the ITL must verify that all applicable submission information has been included and is accurate. The ITL must ensure that the manufacturer provides **two** identical submissions upon receipt because the ITL must submit an identical submission to the MGC for final approval. Any incomplete submissions must be resubmitted to the ITL.



As applicable, the items listed below are required to be included when an ITL receives a submission and when it is submitted to the MGC for final approval:

Associated equipment submission requirements

- Applicable MGC submission form signed and dated
- MGC Certification Letter signed and dated
- ITL Evaluation/Certification Report (included when submitted to MGC)
- Program disks and Source Code
- User Manuals (if applicable) on disk
- Release Notes identifying all changes from previously approved Mississippi version
- Technical documentation
- ITL checklists of detailed testing performed and results (included when submitted to MGC)

Gaming machine submission requirements

- Applicable MGC submission form signed and dated
- MGC Certification Letter signed and dated
- ITL Evaluation/Certification Report (included when submitted to MGC)
- All Technical documentation
- All schematics, printed circuit boards, hardware descriptions, etc.
- Rules, Pay Table verification, Artwork, etc.
- Documentation on microprocessor or microcontroller utilized for the device
- All software source code listings
- Binary images of all compiled code
- All "program storage media", such as EPROMS etc., including graphics, sound and character generators
- Compiler, or access to, for the purpose of building applicable code modules
- Detailed written description of all aspects of the device operation, to include, but not limited to, the random number generator (RNG), pay evaluation routines, bonus features, etc.

- All “source” for any programmable devices, to include, but not limited to, PALs, FPGAs, MicroSequencers, etc.
 - A representative prototype as requested by the MGC to the manufacturer
 - Any specialized hardware needed to perform further evaluation as requested by the MGC to the manufacturer.
 - ITL checklists of detailed testing performed and results (included when submitted to MGC)
2. The ITL shall submit a weekly “Status Report” every Friday to the MGC detailing all submissions received and their status. At a minimum, the items to include within the “Status Report” are the ITL project #, date submission received, manufacturer, type of submission (EGM, System, Kiosk, etc), submission name, version #, model #, target completion date, status of submission (In Progress, Completed, Withdrawn, etc), and comments.
- Status Reports should be separated into two reports - one for slot machines and EGM Cashless game submissions, and the other for associated equipment submissions (systems, kiosks, currency counters, etc.).
 - Status Reports for slot machines and EGM Cashless game submissions should be e-mailed to games@mgc.state.ms.us.
 - Status Reports for associated equipment submissions should be e-mailed to aequip@mgc.state.ms.us.
 - When a submission reaches the status of “Completed” and submitted on the weekly Status Report, the submission form along with an Evaluation/Certification Report of the findings/recommendation and all other supporting test documentation previously covered in Item 1 of this section must be mailed the following week to the applicable person stated above for review. Any future Status Reports need not include that submission.
 - If a manufacturer wishes to **withdraw** a submission, a written withdrawal request must be sent to the ITL and MGC. A withdrawal request must include the entire submission. Partial withdrawals will not be accepted.
3. Upon receipt of a completed ITL submission, the MGC will review all documentation received and make a determination as to whether an on-site review of the submission at the ITL is necessary. If deemed necessary, the MGC will coordinate with the ITL accordingly.
4. At the conclusion of the MGC review process, final approval/denial of the submission will be stamped on the applicable MGC Submission form by MGC personnel ONLY and disseminated to the manufacturer. Any conditional approvals or reasons for denial will be included as an attachment letter with the MGC Submission form.