

August 15, 2012

Patrick Martin
Chris Fleenor
Ohio Casino Control Commission

Subject: IGT Response for Ohio Casino Control Commission Proposed Rule – Game Authentication

Thank you for the opportunity to review the proposed 3772-9-12 regarding Game Authentication. IGT respectfully submits the following suggested changes and understanding.

1. (B)(1)(c) IGT suggests a change to this requirement to express the authentication time in Gigabytes per minute rather than 20 minute time limit. Since many EGM platforms allow for the storage of multiple themes and as game content file sizes expand; the authentication time increases. This change will allow for a scalable solution thus providing the operators with the ability to benefit from the latest game offerings.
2. (B)(1)(e) IGT requests clarification that it will be acceptable to clear any GAT operations and results when exiting the GAT menu so long as it is possible to close and lock the EGM while leaving the GAT menu active, provided all user input is disabled when the door is closed.

The IGT Advanced Video Platform (AVP) Family 14 and emulated models are currently deployed in the Ohio jurisdiction. The IGT AVP offers a serial port that is behind the locked logic compartment – thus meeting “(C) All electronic gaming equipment submitted for approval before November 1, 2012 which offers a communication port, shall comply with the requirements in subsection (B) except (B)(1)(b), upon the installation of new CPSM, and shall comply with this rule by November 1, 2012, unless otherwise approved in writing by the Executive Director or designee.”

The IGT AVP has a newly released operating system that can be requested for approval for OCCC and provided to the operators. The IGT AVP Emulated platform offers the ability for GAT authentication via a diagnostic utility. IGT engineering is in process of investigating if possible to provide the GAT functionality via an updated operating system for our emulated platforms – thus requests acceptance that the usage of the diagnostic utility is acceptable to meet this requirement.

Thank you again for the opportunity to comment on these proposed regulations. If you should have any questions please give me a call at 605-717-0789 or send me email.

Sincerely,

Stan Triplett
Manager of Regional Compliance – Product Compliance- International Game Technology