

**EASTERN SHAWNEE TRIBAL
GAMING COMMISSION**

Mailing Address: 70500 E. 128 RD Suite 1 Wyandotte, OK 74370

Phone: 918-666-9254



GAMING DEVICE/MEDIA

**SHIPMENT, DELIVERY, INSTALLATION
AND REMOVAL REQUIREMENTS**

REVISED December 6, 2019

Table of Contents

ESTGC Approved 12-6-2019

Purpose.....	3
Gaming Devices/System Components	3
Vendor Licensing	4
Compliance and Certification	4
Shipment of Gaming Devices	5
Replacement of Program Storage Media	5
Electronic Gaming Machine Modifications	6
Movements.....	6
Gaming Device Logic Compartment Access	6
INSTALLATION of Gaming Devices/Media	7
MEDIA MALFUNCTION or TESTING.....	8
REMOVAL of Gaming Devices/Media.....	9
AUDIT of Media.....	9
Non-Compliance	10
Prohibited Game Play	11
Remote Access	11
Restrictions.....	11
Waiver Requests	11
No Solicitation	11
Gaming Device Fees	11



Gaming Device Shipping Requirements

Purpose

The purpose of this document is to define the requirements for shipping, delivery, installation and removal of Gaming Devices within the jurisdiction of the Eastern Shawnee Tribe of Oklahoma as regulated by the Eastern Shawnee Tribal Gaming Commission (“ESTGC”).

All gaming device vendors transacting business with gaming facilities regulated by the ESTGC must follow these requirements. Failure to comply with these requirements will result in the initiation of enforcement action proceedings by the ESTGC.

These requirements do not apply to internal movements within the casino, unless the software is accessed. It does apply to movement of gaming machines or software from one Eastern Shawnee Tribal Casino to another or shipments from or to vendors or manufacturers.

Gaming Devices/System Components

Gaming Devices/System Components shall include but not limited to the following:

- ◆ EPROM, SIMM Card, Thumb Drive, SSD, CD/DVD, Flash/CF Card, or Equivalent Software Media
- ◆ Shufflers
- ◆ Kiosks
- ◆ Automatic Jackpot Machines
- ◆ Gaming Machines
- ◆ Gaming Servers including downloadable games
- ◆ Back of House systems/Player Tracking systems
- ◆ Financial Instrument Acceptor/Bill acceptor Firmware
- ◆ Financial Instrument Dispenser Firmware
- ◆ Reel Shelf Driver, as applicable
- ◆ Cabinet Door Controller, as applicable
- ◆ Sign Controller, as applicable
- ◆ Progressive Controller, as applicable

Vendor Licensing

The Gaming Device vendor must ensure all ESTGC licensing requirements have been met prior to shipping any device, hardware, software or media.

Licensing information can be obtained by contacting:

Vendor Licensing Agent
Eastern Shawnee Tribal Gaming Commission
70500 East 128th Rd, Suite 1
Wyandotte, OK 74370

Phone: 918-666-9237
Fax: 855-210-3527

All agents and employees of the gaming vendor that will assist in the installation, removal, upgrades, conversions and software replacement of the gaming devices must be licensed by the ESTGC prior to the scheduled activity.

Compliance and Certification

Each gaming device and related hardware/software must be in compliance with the terms of the “Compact” entered into between the Eastern Shawnee Tribe of Oklahoma and the State of Oklahoma.

Additionally, each gaming device and related hardware/software shall meet all applicable regulations as set forth in the Tribal Technical Standards as adopted by the ESTGC.

Each gaming device and related software must be certified by an Independent Testing Laboratory.

The Independent Testing Laboratory certification must be submitted with and in the same manner as the software shipment notification. The certifications must be received by the ESTGC a minimum of ten (10) days prior to the scheduled installation date.

The gaming devices must be tested, verified and approved by the ESTGC prior to its installation. It is the Vendor’s responsibility to confirm in advance that the ESTGC possesses the appropriate testing tools and adaptors to perform these functions to prevent a delay or suspension of the installation.

Shipment of Gaming Devices

The ESTGC must receive all gaming devices (Class II and Compacted) a minimum of ten (10) calendar days prior to the scheduled installation of the gaming device. The software/hardware shall be sent to the ESTGC.

Prior to the shipping, the vendor must provide the ESTGC with a completed Shipping Notification for all gaming devices shipped to the ESTGC. Only one set of software for each gaming device should be sent. The ESTGC will not accept extra software to keep on hand.

Please remit completed forms to:

Email: egmcompliance@estoo.net
Mail: 70500 East 128th Rd, Suite 1, Wyandotte, OK 74370
Office: 918-666-9254

The ESTGC must receive a completed Shipping Notification.

The delivery vehicle must be sealed and the seal must match the Shipping Notification provided to the ESTGC. For removals, the Vendor shall provide the seal number and seal for the vehicle that will be transporting the gaming machines and the seal must match the Removal Notification.

Upon delivery of any gaming devices to any Eastern Shawnee Tribal Casino, no one shall break the seal of any device, nor shall any device be removed from the delivery vehicle without the physical presence and authorization of an ESTGC EGM Compliance Agent.

(Logic boards with programmable storage media or programmable storage media not installed on a logic board must be shipped separately from the gaming machine. Software will not be shipped preinstalled in a gaming machine without written preapproval for the ESTGC. Upon delivery of gaming devices shipped with software preinstalled, the gaming device shall be opened upon delivery and the vendor shall remove the installed software and submit to an ESTGC EGM Compliance Agent.)

Replacement of Program Storage Media

In order to ensure no unauthorized changes are made to a gaming device that has been approved for placement within an Eastern Shawnee Tribal Casino as required by TICS 100.10, TICS 100.13, MICS 543 and 547 and the ESTGC will monitor the removal and/or replacement of Program Storage Media that controls the game or payouts of a gaming device.

The ESTGC shall be notified by the gaming device vendor with a Shipping Notification. Replacement software should be noted on the form along with version number the software will be replacing. The completed form should be sent to: egmcompliance@estoo.net.

Electronic Gaming Machine Modifications

Any modifications or changes to any previously certified gaming device component or software may not occur until the Independent Testing Laboratory has certified that the modification(s) comply with all requirements of the compact and standards of the ESTGC. This requirement applies to all gaming device's currently in place at an existing Eastern Shawnee Tribal Casino. The ESTGC shall be notified of all requested modifications ten (10) calendar days prior to the changes being made.

Movements

Movement of gaming machines from one Eastern Shawnee Tribal Casino to another requires the use of the ESTGC Gaming Machine Activity Request (GMARA) Form using the same establish timeline. Internal movement or movements of gaming devices is accomplished by the ESTGC and only requires that the EGM Compliance Supervisor or the ESTGC EGM Compliance Agent authorized by the EGM Compliance Supervisor, be notified of such movement. The EGM Compliance Supervisor or ESTGC EGM Compliance Agent authorized by the EGM Compliance Supervisor may waive in writing any section or requirement in this policy.

Gaming Device Logic Compartment Access

The compartment containing the logic board or other related equipment shall be sealed by the ESTGC. Vendor access to this area is restricted unless authorization has been received from the ESTGC for entry. The ESTGC seal shall not be tampered with or compromised at any time.

The following procedures will apply prior to movement of the devices to the gaming floor or storage area:

- ◆ The Key Controller shall maintain secured possession of all keys that control access to the logic board areas or areas where programmable storage media are located or areas which control the game or payouts.
- ◆ Keys that control access to the logic board areas or areas where programmable storage media are located or areas which control the game or payouts will be issued to ESTGC Compliance departments. Keys must be returned by the ESTGC Agent that was issued the keys, once the specific task has been completed or prior to the end of shift for the ESTGC Agent who was issued the key set.
- ◆ Keys the control access to the logic board areas or areas where programmable storage media are located or areas which control the game or payouts will not be issued to non- ESTGC employees or Vendors.
- ◆ Controlled keys shall be verified to the proper locking mechanism, logged, and issued to the Key Controller where proper key controls shall be implemented.
- ◆ Any area where programmable storage media is located with or without separate locking mechanisms, ESTGC Agent shall seal the compartment or the individual programmable storage media with a pre-numbered tamper resistant seal that is controlled by the ESTGC.
- ◆ The ESTGC shall apply a permanent serialized identification label to the exterior of the gaming device.

INSTALLATION of Gaming Devices/Media

- 1) Installation of the gaming device/media should occur in a manner that minimizes the impact to the gaming environment.
- 2) When the vendor installation crew is ready, the ESTGC will release the program storage media to the technician(s) to install. The gaming devices/media shall be tested before being released for "live play".
- 3) 10 days prior to any new installation, the gaming device vendor will provide all EPROM, SIMM Card, Thumb Drive, SSD, CD/DVD, Flash/CF Card or other software equivalent media (media) to the Eastern Shawnee Tribal Gaming Commission (ESTGC), along with documentation either email, thumb drive or on a CD/DVD from an approved testing lab and Par Sheets. This documentation must describe each gaming device/media type and outline the method for identification. The documentation must include: gaming device/media type, list all identifying numbers on each piece of gaming device/media, device family, device size and expected Test Signature results and pay tables.
 - a. The Vendor is responsible for supplying the ESTGC the theoretical hold percentages for each game 10 days prior to installation.
- 4) The ESTGC does not maintain master media for the purpose of replacement or duplication. The ESTGC will receive the quantity of media needed for installation into any new gaming machines and will not receive or maintain extra media.
 - a. Financial Instruments Acceptor/Dispensers or Bill Acceptor firmware shall be exempted from the standard 4) above.
- 5) The ESTGC will test all gaming device/media utilizing a Test Method gaming tester.
 - a. Tested gaming device/media that does not match the signature information provided by the vendor will be retested.
 - b. If tested gaming device/media does not agree with the identification standards or signature specified by the written documentation, the vendor will be notified and asked to provide a new gaming device/media or corrected identifying documentation.
 - c. Gaming device/media that cannot be verified to the signature information is rejected and returned to the vendor.
 - d. Only tested and approved gaming devices/media will be retained by the ESTGC. No master gaming device/media will be maintained by the ESTGC.
- 6) All approved gaming devices/media will be logged to the Vendor Inventory Retention Log/Software Data Base. Media will then be placed into locked storage. Only the ESTGC personnel will have access to the stored media. Media will not be released to a person of any other department. Information to be included on the log:
 - a. Description of each piece of media (as described on the written documentation) and quantity received;
 - b. Vendor
 - c. Date and time;
 - d. Signature and Badge number of person placing in inventory.
- 7) On the established date of installation, the ESTGC will remove the media from locked storage and prepare to escort it to the casino for installation. An entry will be made on the Vendor Inventory Retention Log/Software Data Base:
 - a. Date removed from inventory and taken to the casino for installations; and

- b. Signature and badge number of the ESTGC personnel removing from inventory.
- 8) The media will then be installed in the gaming device.
 - a. The ESTGC Agent will verify the theoretical hold percentage set up in the machine matches the documentation from the vendor.
- 9) All gaming machines (Class II and Compact) will be sealed with a serialized seal by the ESTGC. The seal should be placed and secured to the logic board or door in which the media is located.
 - a. Serialized seals are maintained by the ESTGC.
 - b. Seals should be used sequentially.
 - c. Destroyed seals will be recorded and tracked.

MEDIA MALFUNCTION or TESTING

- 1) If a gaming device malfunctions, the casino will notify the vendor.
- 2) If during the process of troubleshooting or repairing the gaming machine the vendor determines that the media is causing the malfunction, the ESTGC will be notified.
 - a. Neither casino staff nor the gaming machine vendor will tamper with or remove the seal securing the media.
- 3) The vendor will let the casino know of the bad media and the casino will place an order with the vendor for replacement (software) media and the ESTGC 10 day shipping requirements will be followed.
 - i. The machine will be deactivated until the receipt of the new media. When new media is received, it will be installed as described in the INSTALLATION section of this document.
 - ii. The ESTGC representative will place a new serialized seal over the area (logic door) where the media is to be installed.
 - iii. The seal number will be recorded in the Gaming Machine Database.
 - iv. The ESTGC will log the bad media into the ESTGC Software Log.
 - v. The vendor will have 10 days (from the removal of the media from the machine) to request the media back.
 - vi. If the vendor should request the media to be shipped back, the vendor will provide a return label of selected courier to the ESTGC representative and the bad media will be sent back immediately.
 - vii. If the vendor does not request the media to be sent back and no notification has been sent to the ESTGC, the media will be destroyed after the 10 days.
- 4) Once the vendor is present the ESTGC personnel will remove the seal securing the media and document the activity in the Gaming Machine Database.
- 5) Date and time of the activity and signatures and badge numbers for the vendor, if any, casino gaming technician and ESTGC representative, will be added to the Gaming Machine Database.

REMOVAL of Gaming Devices/Media

- 1) Media will not be removed from any gaming machine by anyone other than a representative of the ESTGC and following these specific procedures.
- 2) A vendor must notify the ESTGC at least ten days prior to the removal of gaming machines from any gaming facility owned and operated by the Eastern Shawnee Tribe of Oklahoma. Or, the ESTGC may notify a vendor of their intent to remove gaming machines from an Eastern Shawnee Tribal gaming facility. In either situation, the ESTGC and vendor must establish a mutually agreed upon date and time for removal of the gaming machines.
- 3) The vendor will then submit the ESTGC removal notification and list the machines that are to be removed along with serial numbers and game themes at least 10 calendar days before the scheduled activity.
- 4) The ESTGC representative and the vendor will remove the media before machines are removed from the Eastern Shawnee Tribal gaming facility and follow these steps:
 - a. The ESTGC will - remove the seal covering the media and document it in the Gaming Machine Database.
 - b. The vendor will remove the media and turn over to the ESTGC representative.
 - c. The ESTGC will log the media into the ESTGC Software Log and it will be held there for 10 days.
 - d. The vendor -will have 10 days (from the removal of the media from the machine) to request the media back.
 - e. If the vendor should request the media to be shipped back, the vendor will provide a return label of selected courier to the ESTGC representative and the bad media will be sent back immediately. NOTE: A return label can be sent with the shipping notification.
 - f. If the vendor does not request the media to be sent back and no notification has been sent to the ESTGC, the media will be destroyed after the 10 days.
- 5) The ESTGC personnel was document the activity in the Gaming Machine Database.

AUDIT of Media

- 1) On an annual basis, a representative of the ESTGC will test ten percent (10%) of the gaming devices in operation on the casino floor and back of house to ensure the integrity of the gaming device/media.
- 2) A minimum of five (5) machines must be tested for each Compacted vendor and all Class II servers must be tested.
- 3) Vendors will be notified and scheduled to be on site with the ESTGC representative doing the audit. Compacted vendors will be required to pull the media and turn over to the ESTGC representative for the Testing Method. Class II vendors will be required to access servers for the ESTGC representative to perform Testing procedures.
- 4) Using the Testing Method, the ESTGC will test the gaming device/media. The following information will be verified:
 - a. Gaming Device/Media Identification:
 - i. Numbers shown on media labeling;
 - ii. Manufacturer.
 - b. Test signature;

- c. Vendor;
 - d. Machine number;
 - e. Seal number.
- 5) If a variance to last reported information is discovered, it must be recorded on the Annual Testing Log in the comment/variance section.
 - 6) Vendor, Test Signature, machine number/device and seal number will also be verified to the Gaming Machine Database.
 - a. If discrepancies are observed, gaming operation should be notified so that corrections can be made.
 - 7) If an error occurs during testing, the gaming device/media will be retested using the Testing Method equipment. The vendor will be notified to provide (replacement software) new media and the gaming device or machine will be deactivated.
 - a. The steps outlined for removal under MEDIA MALFUNCTION OR TESTING (7) should be followed.
 - 8) Date and Time of the activity and signatures and badge numbers for the vendor, if any, casino gaming technician and ESTGC representative, will be added to the Annual Testing Log.

Non-Compliance

It is the vendor's responsibility to ensure that all technicians (and related employees) are aware of the requirements and procedures outlined in this document.

The ESTGC may issue a notice of violation to any vendor (or respective employee) for failure to adhere to these written policies. A notice of violation may result in machine installation delays, fines, license revocation or gaming device removal.

The possible imposition of a fine shall not exceed \$5,000.00 per instance of violation.

Incomplete forms may be considered invalid and shipment or movement may be rejected and the vendor will receive a notice of violation and possible fine.

Types of infractions resulting in non-compliance include but are not limited to:

- ◆ Software sent to the ESTGC that hasn't been Independent Testing Laboratory certified.
- ◆ Software sent to the ESTGC for the wrong jurisdiction.
- ◆ Software sent to the ESTGC that does not match Independent Testing Laboratory certification.
- ◆ Software sent to the ESTGC with the wrong main-game program. Software, server or game modifications made without ESTGC approval.
- ◆ Failure to deliver a gaming device or software prior to ten day notification period.
- ◆ Failure to send software via an independent carrier.
- ◆ Failure to replace revoked software within specified time frame set by the Independent Testing Laboratory.
- ◆ Delivery of gaming device or software without notification. Delivery truck seal missing or tampered with.

- ◆ Contents of delivery truck do not match shipping notification.
- ◆ Logic compartment seal tampered with or broken.

Prohibited Game Play

Any individual who is directly or indirectly involved in hardware or software development, engineering, maintenance, repair, installation, or any activity that relates to the functionality of a gaming machine, gaming software, or gaming device is PROHIBITED from all game play or promotions at any casino owned or operated by the Eastern Shawnee Tribe of Oklahoma.

Remote Access

When the vendor is accessing the system remotely, the vendor must follow the casino's Remote Access Policy.

Restrictions

Laptops or other electronic devices shall not be permitted on the gaming floor and may not be used by technicians while accessing the gaming machines unless approved by the ESTGC in advance.

Waiver Requests

Any deviations from these requirements will require the vendor compliance department to submit to the ESTGC a full description of the deviation requested. All waiver requests must be approved by the ESTGC prior to the scheduled activity. All waiver requests are reviewed on a case by case basis.

No Solicitation

During the term of the Agreement and for 90 days after any termination of the Agreement, the Vendor will not, without the prior written consent of the gaming operation, either directly or indirectly, (on vendor's own behalf or in the service of or on behalf of others), solicit or attempt to solicit, divert or hire away any person employed by the gaming operation.

Gaming Device Fees

Gaming Device installs, conversions, software replacements, upgrades and removals: \$25.00 per device to be billed monthly. (See below for the exception of Gaming Machines and Server installs.)

Gaming Machine and Server Installations: \$50.00 per device to be billed monthly.

Annual Machine Fees: \$50.00 per machine as of Jan. 1.