

**From:** Ted Townsend [<mailto:tt@bingostar.com>]  
**Sent:** Friday, April 13, 2012 4:37 PM  
**To:** Purohit, Nimish J.  
**Cc:** Yuri Itkis; Bill Jacques  
**Subject:** Fortunet Comments for 543 and 547

Good Afternoon,

During the recent San Diego NIGC conference, Roger Ooms (Fortunet's Strategic Sales Director) had an opportunity to discuss with you the NIGC's proposed Class II Standards. Since then, we at Fortunet reviewed the standards with the operation of a traditional bingo hall in mind.

Attached for your consideration are Fortunet's comments on the NIGC's proposed standards. Please contact me should you wish to discuss the attached.

Thank You,

Ted Townsend,  
Director of Compliance  
Fortunet, Inc.  
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## FortuNet, Inc.

SECTION 543 DATED MARCH 16, 2012	
Section	Comment
543.2	Kiosk Definition: Fortunet is developing a kiosk that, in addition to the defined functions, will also accept cash & credit cards and issue gift certificates & paper pull tabs. Could this definition be expanded accordingly?
543.7(b)(3)	Suggest adding “and type” so this would read, “Number and type of bingo cards sold”. Without knowing the type of bingo board sold you cannot determine the dollar amount of bingo sales.
543.7(c)(2)	States, “For all games offering a prize payout of \$1,200 or more, as the objects are drawn, the identity of the objects are immediately recorded and maintained for a minimum of 24 hours.” Fortunet strongly recommends that this information be maintained for all payouts.
543.7(c)(3)	States, “All objects eligible for the draw are available to be drawn prior to the next draw.” In any particular bingo session, some bingo games may “carry over” from one game to the next. For example, Game #7 could be for a Letter X but then continue on into Game #8 for a coverall prize (without re-racking the bingo balls). Does this standard preclude a “carry over” game?
543.7(d)(3)	We believe it is important to expand on the term “validity”. Please consider including “(e.g., card sold for specific session, card not voided, etc.)”.
543.8(b)	<p>We respectfully request that an exception to the bingo card inventory standards be added for barcoded bingo paper. Fortunet uses barcoded bingo paper which is tracked by the computerized bingo system through every step of the bingo operation:</p> <ol style="list-style-type: none"> <li>1. Barcode contains serial number and is cross-referenced to the specific numbers printed on the bingo card face.</li> <li>2. Paper delivered to bingo hall and entire inventory entered into bingo system.</li> <li>3. Paper is scanned as it is sold to the players and the system produces a receipt for the exact purchase amount. Also note that the system knows exactly which cards are being played.</li> <li>4. When a bingo is called, the card’s serial number is entered into the system and the system verifies that the card was sold for that session and is a winner. Note that any cards that were not scanned as being sold will <i>not</i> be considered a valid winner.</li> </ol> <p>Based on the above, we respectfully request an exception for barcoded paper be written into the standards.</p>
543.9	Fortunet manufactures barcoded paper pull tabs that are controlled in exactly the same manner as our barcoded bingo paper. As such, we respectfully request exclusions from defacing redeemed pull tabs. Also, we request an exclusion from the “two agent’ verification procedures for payouts of \$600 or more. Rather, we believe the process set forth in 543.9(d)(3)(ii) is appropriate for barcoded paper pull tabs.
543.9	Fortunet anticipates selling and redeeming paper pull tabs via a kiosk. No human interaction would be needed. We respectfully request that this standard be re-written for pull tab sales and redemption via a kiosk.

## FortuNet, Inc.

SECTION 547 UPDATED DISCUSSION DRAFT – FortuNet, Inc. Comments	
Section	Comment
547.7(b) 547.7(c) 547.7(d)	Many of the proposed hardware standards relate directly to Class II slot-style gaming devices. FortuNet manufactures/assembles a traditional bingo system using off-the-shelf products such as personal computers, video displays, etc. Therefore, we respectfully request that several of the standards be re-written to restrict applicability to “non-off-the-shelf devices”.
547.8(a)(1)(iii) 547.8(a)(2) 547.8(b)(2) 547.8(b)(3) 547.8(d) 547.8(e) 547.8(i) 547.8(l)(3) 547.10 547.10(a)(3)(iii)	For the reasons stated above and due to the fact that our bingo system does not encompass cashless wagering (e.g., wagering credits, wagering instruments, etc.) or electronic random number generators, the system is not Class II slot-style game. Therefore, we respectfully request that traditional bingo systems be exempt from certain software standards involving “credits”.
547.8(d)(vii)(A)	FortuNet manufactures traditional barcoded paper pull tabs. The barcode includes the pull tab’s serial number. In the future we will offer a kiosk that can redeem the paper pull tabs and, using a video screen, display a celebration mode if the pull tab is a winner. In that this is not a Class II slot-style gaming device, we respectfully request that this standard be re-written to allow for the display of a celebration mode rather than a reproduction of the winning pull tab. Possibly rewrite to say, “The illustrated game outcome for each pull tab;...”
547.8(h)(3)	For the reasons given above with regard to credits, we request that the words, “if any”, be added to the credit display requirements.
547.16(a)(4)(iv)	We suggest adding the word “that” as follows, for clarity:  For <del>bingo and games similar to bingo</del> <u>Class II Gaming Systems</u> , the prize schedule or other explanation need not state that subsets of winning patterns <i>that</i> are not awarded as additional prizes...