



# Impact of Mobile Gaming

Division of Technology



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## Objectives

- Types of Mobile Gaming Technology
- Basics of How Each Operates
- Considerations
  - Operational
  - Security
  - Regulatory
- Alternate Technical Standards
- Auditing and Regulatory Tips and Practices

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## Use of Technological Aids

**547.1**



Permits the use of Technologic Aids with the play of Class II Games

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 **Casino Owned Tablets**



- Casino Owned Device
- Safer Connection to Network
- Impractical

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 **Casino & Vendor Applications**

- Casino Branded Application
- Promotional Marketing Apps
- Social Media Based Gaming



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 **Online Gaming**

- Overseas
- Device as a user interface
- Uncommon In US
- Regulatory Hurdles
- Due Diligence



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**Sports Betting and Event Betting**

**Sports Betting**

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**Mobile**

Resources: 25 CFR § 502.4(c)

**Mainstream**

**Fantasy**

**eSports**

**Non-sports**

**In-play bets**  
**Parlay bets**

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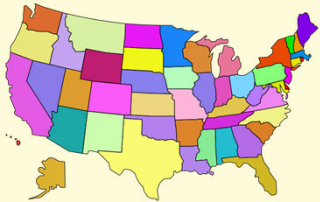
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**Geofencing**

**What is it?**

**Types:**

- Wi-Fi within a property
- GPS within a boundary
- Casino vs. BYOD



Resources: 547.15(b), 543.20(e)  
GLI-33  
NIST800-124r1 8

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**Geofencing**

**Issues:**

- Inexperienced Developers
- Link to phone PII
- Link to casino networks (SQL injection, MitM attacks)
- IP / GPS spoofing (VPNs, Pokémon)



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**Gaming with Cellular Phones**



**Considerations:**

- Few Vendors
- Class II vs Class III
- Technological & Regulatory Hurdles
- Proper Configuration
- Jurisdictional Approval
- Connection to CMS 543.20(h) Remote access
- Variances
- Expiration of Bingo Cards
- New TICS/SICS?

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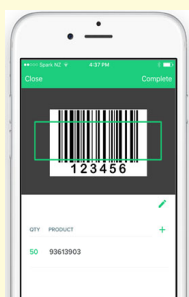
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**Mobile Vouchers**



**Considerations:**

- New vendors
- Add credits to account
- Scan voucher to account
- Buy chips

**Resources:**  
547.15(b)  
GLI-33  
NIST800-124r1

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**Mobile Vouchers (Continued)**

**Considerations:**

- Stand Alone vs Integrated with Casino App
- Connection to CMS
- 543.20(h) Remote Access
- Cash Only Accounts vs Identity Verification
- Possible ACH Deposits?
- Money Laundering Controls?
- Training Surveillance

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**Alternative Technical Standards**



- Why?
- Outside of scope of original 547
- ie. 547.4(b) "Prototype"
- ie. 547.16(b) Disclaimers

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**Alternative Technical Standards**

547.2 -  
"Not limited to terminals, player stations, handhelds, fixed units, etc."

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**Alternative Standard -**  
"Not limited to terminals, player stations, handhelds **such as Class II mobile devices, fixed units, etc.**"

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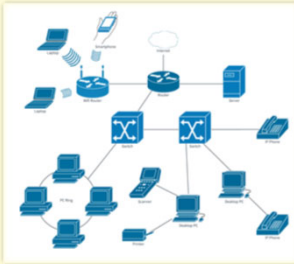
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**Tips for Auditing**



- What does this interact with?

Resources:  
543.20 Physical & Logical  
NIST800-171r1  
ISO/IEC 27001

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### Tips for Auditing (Continued)

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graph TD
    Q1[DOES IT MOVE?] -- No --> Q2[Should it?]
    Q1 -- Yes --> Q3[Should it?]
    Q2 -- No --> A1[No Problem]
    Q2 -- Yes --> I1[Bottle]
    Q3 -- Yes --> A2[No Problem]
    Q3 -- No --> I2[Roll of Tape]
        
```

- How does this work?
- Is it applicable to audit or regulation?

Resources:  
 NIGC  
 Vendor  
 ITL

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### Tips for Auditing (Continued)

- Who has access?
- What kind of access?

| Basis     | Allow                               |                                     |                                     | Conditional              |                                     |                                     | Disallow                 |                          |                          |
|-----------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
|           | Master                              | Reference                           | Thumb                               | Master                   | Reference                           | Thumb                               | Master                   | Reference                | Thumb                    |
| Copyright | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| Policy    | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Remember: 543.20(f) User Controls
 

- RBAC – Role Based Access Control
- INCITS 359-2012

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### Tips for Auditing (Continued)

- How is that access logged?
- How is that access reviewed?

Resources:  
 543.20(f) User Controls  
 NIST800-53r4  
 ISO 27001 - A.9

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 Questions

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| <b>Jeran Cox</b><br>IT Auditor<br>jeran_cox@nigc.gov   | <b>Michael Curry</b><br>IT Auditor<br>michael_curry@nigc.gov     |
| <b>Sean Mason</b><br>IT Auditor<br>sean_mason@nigc.gov | <b>Tim Cotton</b><br>IT Audit Manager<br>timothy_cotton@nigc.gov |

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