



Via Email

November 26, 2025

Rey Kitchkumme, Chairman
Prairie Band Potawatomi Tribal Gaming Commission
14978 West Casino Drive
P.O. Box 129
Mayetta, KS 66509

RE: Submission of alternate technical standards to 25 C.F.R. Part 547

Dear Chairman Kitchkumme:

I am writing with respect to your request, received by the National Indian Gaming Commission (NIGC) on October 1, 2025, on behalf of the Prairie Band Potawatomi Tribal Gaming Commission for the review and approval of Prairie Band Potawatomi Tribal Gaming Commission (PBGC) Alternate Standards to 25 C.F.R. Part 547 approved by the PBGC on September 29, 2025. Pursuant to 25 C.F.R. § 547.17(b), the NIGC Chair may approve or object to alternate standards approved by a tribal gaming regulatory authority.

Thank you for providing the following alternate standards and supporting documentation for my review: 25 C.F.R. §§ 547.2, 547.4(b), 547.5(b)(1)(iv), 547.7(d), 547.16(b), and 547.16(c). The PBGC also submitted an additional standard titled 547A - Mobile Wagering Accounts, and PBGC clarified it is not meant to replace or be an alternate standard to any current NIGC regulation.

The submitted PBGC Alternate Standards to 25 C.F.R. Part 547 are approved as the alternate standards appear to achieve a level of security and integrity sufficient to accomplish the purpose the standards they are meant to replace. Please note, 547A - Mobile Wagering Accounts is not included in this approval. If you have any questions concerning this letter, please contact Staff Attorney Mandy Cisneros at mandy.cisneros@nigc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Sharon M. Avery".

Sharon M. Avery
Chair (Acting)

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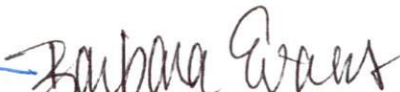
Prairie Band Potawatomi Tribal Gaming Commission

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September 29, 2025

The Prairie Band Potawatomi Tribal Gaming Commission approves the attached alternate standards related 25 C.F.R. § 547 Minimum Technical Standards and justifications. The specific sections of 25 C.F.R. § 547 which we are approving alternate standards for are: 547.2, 547.4(b), 547.4(b)(1)(iv), 547.7(d), 547.16(b) and 547.16(c). In addition, the attached additional standard 547A – Mobile Wagering Accounts for Class II games played with a mobile device is also approved.


Rey Kitchkumme, Chairman


Barbara Evans, Treasurer


April C. Keo, Secretary

Prairie Band Potawatomi Tribal Gaming Commission (PBGC) Alternate Standards to 25 C.F.R Part 547

Item	Part 547 Minimum Technical Standard	PBGC Alternate Standard	Justification
1	25 C.F.R. § 547.2 Class II gaming system. All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations. Player interface. Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a Class II game.	•547.2 Class II gaming system. All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, such as a Class II Mobile Gaming System, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations. Player interface. Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds such as a Class II Mobile Device, fixed units, etc.), that directly enables player interaction in a Class II game.	Integrity stays the same. Class II mobile gaming devices/systems are added to the list of items included in the Class II gaming system and Player Interface definitions to further define them.
2	25 C.F.R. § 547.4(b) Approved Gaming equipment and software only. All gaming equipment and software used with Class II gaming systems must be identical in all respects to a prototype reviewed and tested by a testing laboratory and approved for use by the PBGC pursuant to 547.5(a) and (b).	•547.4(b) Approved Gaming equipment and software only. All gaming equipment, except for any Class II Mobile Device, and software used with Class II gaming systems must be identical in all respects to a prototype reviewed and tested by a testing laboratory and approved for use by the PBGC pursuant to 547.5(a) and (b). Any Class II Mobile Device used with a Class II Mobile Gaming System must comply with the applicable requirements for such device set by the Federal Communications Commission. The operation shall ensure that any Class II Mobile Gaming occurs only on a Class II Mobile Device utilizing game software that has been reviewed and approved for use by the PBGC.	With a Class II Mobile Gaming system, it would be difficult for an Independent Testing Laboratory (ITL) to test player owned devices such as cell phones and tablets. However, having the devices be FCC accredited (or similar) along with PBGC approved game software running on the device, we retain security and integrity of the gaming system. The requirement for the game software to be identical to a prototype tested by an ITL will remain the same.

3	25 C.F.R. § 547.4(b)(1)(iv) The testing laboratory's written report confirms that the operation of a player interface prototype has been certified that it will not be compromised or affected by electrostatic discharge, liquid spills, electromagnetic interference, or any other tests required by the PBGC;	•547.4(b)(1)(iv) The testing laboratory's written report confirms that the operation of a player interface prototype, other than a Class II Mobile Device, has been certified that it will not be compromised or affected by electrostatic discharge, liquid spills, electromagnetic interference, radio frequency interference, or any other tests required by the PBGC. Any Class II Mobile Device must comply with the applicable requirements for such device set by the Federal Communications Commission;	Again, an ITL cannot test all player owned devices. We rely on the fact that these player owned devices have been vetted by an accredited organization (FCC or similar) to test for this along with other requirements being met before being offered to the public.
4	25 C.F.R. § 547.7(d) Player interface. The player interface must exhibit a serial number and date of manufacture and include a method or means to: (1)Display information to a player; and (2)Allow the player to interact with the Class II gaming system.	•547.7(d) Player interface. (1)Any player interface, except for a Class II Mobile Device, must exhibit a serial number and date of manufacture; (2)At the time Of Class II Mobile Gaming software installation and registration, a Class II Mobile Gaming player Account shall be issued a unique identification number that shall be recorded by the operation. The Class II Mobile Device identification number shall not be transferable to a different Class II Mobile Device; (3)Any player interface must include a method to: (i)Display information to a player; and (ii)Allow the player to interact with the Class II gaming system. (4)Any player interface is restricted to one active log in per session.	While most technological devices have a serial number, this is something that would not be able to be recorded for our records. However, we will require the system to issue a unique identifier to that player owned account to supplement the physical serial number. The software on the player owned device will be required to display information along with allowing the player to interact with the system. Furthermore, we will require the system to only allow the player interface to be restricted to one active login per session.
5	25 C.F.R. § 547.16(b) Disclaimers. The Player Interface must continually display: (1)"Malfunctions void all prizes and plays" or equivalent; and (2)"Actual Prizes Determined by Bingo (or other applicable Class II game) play. Other Displays for Entertainment Only" or equivalent.	•547.16(b) Disclaimers. (1)Except for Class II Mobile Devices, the Player Interface must continually display: (i)"Malfunctions void all prizes and plays" or equivalent; and (ii)"Actual Prizes Determined by Bingo (or applicable Class II game) play. Other Displays for Entertainment Only" or equivalent. (2)For Class II Mobile Devices, the information in subsection (b)(1)(i)-(ii), must be displayed prior to initiating a session.	The information required to be presented to the player will be available at the beginning of the Player session. They will have to acknowledge this information before being allowed to play on their device.

6	25 C.F.R. § 547.16(c) Odds notification. If the odds of winning any advertised top prize exceeds 100 million to one, the Player Interface must display: "Odds of winning the advertised top prize exceeds 100 million to one" or equivalent.	•547.16(c) Odds notification. (1) If the odds of winning any advertised top prize exceeds 100 million to one, the player Interface (excluding any Class II Mobile Device) must display: "Odds of winning the advertised top prize exceeds 100 million to one" or equivalent. (2) For Class II Mobile Devices, the information required by subsection (c)(1) must be displayed to the player prior to the start of game play.	The information required in this section will be included at the beginning of play and they will acknowledge this before their session will begin.
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547A. Mobile Wagering Accounts

- (1) Wireless communication between the Mobile Wagering Account and the Class II Mobile Device shall be conducted using a method that securely links the Mobile Wagering Account and the Class II Mobile Device and authenticates both the Class II Mobile Device and the Mobile Wagering Account as authorized to communicate over that link.
- (2) Prior to engaging in mobile gaming, a patron shall establish a Mobile Wagering Account. The Class II Mobile Gaming System shall be required to display in the terms and conditions that those casino key employees and casino employees prohibited from wagering shall not be permitted to establish a mobile account.
- (3) In order to establish a Mobile Wagering Account, the gaming facility shall:
 - a. Create an electronic patron file, which shall include at a minimum:
 - i. Patron's legal name;
 - ii. Patron's date of birth;
 - iii. Patron's mobile account number;
 - iv. Patron's address;
 - v. Patron's electronic mail address;
 - vi. The method used to verify the patron's identity; and
 - vii. Date of verification.
 - b. Encrypt all of the following information contained in an electronic patron file:
 - i. Patron's Social Security number or equivalent for a foreign patron such as a passport or taxpayer identification number;
 - ii. Patron's passwords and/or PINs; and
 - iii. Credit card numbers, bank account numbers, or other personal financial information.
 - c. Verify the patron's identity in accordance with a standard approved by the Prairie Band Gaming Commission that is consistent with both this section and industry standard regulatory practices in other jurisdictions, and record the document number of the government issued credential examined. Alternatively, the other method for remote multi-sourced authentication approved by the Prairie Band Gaming Commission, which may include third-party and government databases, may also be used.
 - d. Require the patron to establish a password or other access security feature with the ability to utilize "strong authentication" log in protection as determined by the Prairie Band Gaming Commission;
 - e. Verify that the patron is of the legal age of 21, not self-excluded, on the exclusion list, or otherwise prohibited from participation in gaming;
 - f. Record the patron's acceptance of the gaming facility's terms and conditions to participate in mobile gaming;
 - g. Record the patron's certification that the information provided by the individual who registered is accurate;
 - h. Record the patron's acknowledgement that the legal age for mobile gaming is 21 and that he or she is prohibited from allowing any other person to access or use his or her Mobile Wager Account; and
 - i. Notify the patron of the establishment of the account via electronic mail or regular mail.
- (4) Each Mobile Wagering Account shall be assigned a unique account identifier.

- (5) Patron shall be required to authenticate his or her identity prior to accessing the Mobile Wagering Account.
- (6) The Mobile Wagering Account shall create a record of all transactions, including amount, date and time of transaction and location of the Class II Mobile Device at time of transaction.
- (7) A patron shall have only one Mobile Wagering Account. Each Mobile Wagering Account shall be:
 - a. Non-transferable;
 - b. Unique to the patron who establishes the account; and
 - c. Distinct from any other account number that the patron may have established with the gaming facility.
- (8) A patron's Mobile Wagering Account may be funded through the use of:
 - a. A patron's credit or debit card;
 - b. A patron's deposit of cash, gaming chips, or slot tokens at a cashiering location approved by the Prairie Band Gaming Commission;
 - c. Cash complimentaries; promotional credits; or bonus credits;
 - d. Winnings;
 - e. Adjustments made by the gaming facility with documented notification to the patron;
 - f. A patron's digital wallet, which has been verified as being issued to the patron; or
 - g. Any other means approved by the Prairie Band Gaming Commission.
- (9) Prior to any withdrawal, if a patron used a credit or debit card to fund a Mobile Wagering Account, any remaining balance in the account up to the amount of the deposit shall be refunded to the patron's credit or debit card account used to fund the Mobile Wagering Account provided that a credit or debit card issuer permits the return of a withdrawal from a Mobile Wagering Account funded by the credit or debit card of the issuer.
- (10) Funds may be withdrawn from a patron's Mobile Wagering Account for the following:
 - a. The funding of game play;
 - b. Cash-out at the cashier's cage immediately upon patron request;
 - c. Adjustments made by the gaming facility with documented notification to the patron;
 - d. Cash-out transfers directly to the patron's individual account with a bank or other financial institution (banking account) provided that the gaming facility verifies the validity of the account with the financial institution;
 - e. A cash-out transfer to a patron's digital wallet, which has been verified as being issued to the patron; or
 - f. Any other means approved by the Prairie Band Gaming Commission.