



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

March 27, 2014

Ted Townsend
Director of Compliance
Fortunet Inc.
3901 Graphic Center Drive
Las Vegas, NV 89118

RE: EDGE Bingo System v. 3.5.7

Dear Mr. Townsend,

Thank you for requesting approval of the upgrade to the Edge Bingo System v.3.5.7. We have completed our review.

The Edge Bingo System is approved for use in Washington State (see attached document for the electronic signatures). We are approving the Edge Bingo System with the following requirements:

- A separate login for the SQL database should be established that is separate from the Windows login.
- Fortunet is not allowed to access the Edge Bingo System remotely for maintenance, upgrading or trouble shooting. These functions must be performed by a licensed manufacturer representative onsite at the licensed location. If Fortunet intends to use external tools to connect to this equipment they must comply with WAC 230-16-151.
- Fortunet must notify the licensed location before remotely accessing the Edge Bingo System for billing purposes.
- Slingo Joker's Wild was not submitted for review with this submission and must be disabled prior to installing the system in WA.
- The electronic raffle feature in the Edge Bingo System must be disabled prior to installing the system in WA.



- You must notify us prior to the first installation in Washington so arrangements may be made for Agent inspection/review. At least 10 business days prior to installation, provide us with a list to include specific locations, dates, and times when this system will be installed. Send the list to Sonja Dolson at sonja.dolson@wsgc.wa.gov.

Additional Requirements for Bingo Licensees:

- If the player tracking feature is used to award and/or redeem player points based on the amount a player spends, the licensed bingo hall must ensure they comply with the requirements in WAC 230-06-030 – Restrictions and conditions for gambling promotions.

Any modifications made to the Edge Bingo System must be submitted to us for additional testing and review. We reserve the right to investigate and reevaluate the Edge Bingo System if we determine that such a review is necessary to ensure compliance with applicable rules or laws in Washington.

Thank you for your cooperation during this process. We appreciate your desire to comply with our regulations. If you have any questions regarding this matter, please contact me at (360) 486-3546.

Sincerely,



Tina Griffin
Assistant Director
Licensing Operations Division
Washington State Gambling Commission

Enclosures

cc: Mark Harris, Assistant Director Field Operations Division
Julie Lies, Assistant Director Tribal Gaming Division
File



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

March 1, 2013

Ted Townsend
Fortunet, Inc.
3901 Graphic Center Drive
Las Vegas, NV 89118-1765

RE: Remote access procedures

Dear Mr. Townsend,

You provided information to me in response to a request that Fortunet research their remote access procedures, if any, for approved bingo systems in the state. In your email on February 8, 2013, you stated that you use proprietary software named HallComm to dial into a DOS computer at the bingo location. The DOS computer has two functions: 1) to coordinate the video displays on the flash boards or advertising and 2) to house a modem to access the hall's sales files. Fortunet accounting staff dials into the modem to "Retrieve Sales Files". You stated that you do not remotely access systems in Washington for trouble shooting or upgrades to the bingo systems.

It is our understanding that sales information is retrieved for purposes related to billing. You are approved to remotely transfer billing information only.

You cannot remotely access your systems in Washington for any other purpose, to include but not be limited to, troubleshooting, maintenance, or upgrades.

Thank you for your cooperation during this process. We appreciate your desire to comply with our regulations. If you have any questions regarding this matter, please contact me at (360) 486-3546.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer LaMont".

Jennifer LaMont
Program Manager
Licensing Operations Division

Enclosure

cc: Mark Harris, Assistant Director Field Operations Division



LaMont, Jennifer (GMB)

From: Ted Townsend [tt@bingostar.com]
Sent: Friday, February 08, 2013 3:52 PM
To: LaMont, Jennifer (GMB)
Subject: RE: Fortunet Remote Access

One of the two purposes of the single server in question is to coordinate the video displays around the bingo room. The video displays could be the flash boards or advertising. The video portion is not accessed by the stored procedure that retrieves the sales information.

From: LaMont, Jennifer (GMB) [mailto:jennifer.lamont@wsgc.wa.gov]
Sent: Friday, February 08, 2013 3:48 PM
To: Ted Townsend
Cc: LaMont, Jennifer (GMB); GMB DL GET
Subject: RE: Fortunet Remote Access

Thank you for the information. I was unaware that GameTech remotely accessed the systems for upgrades as this is not in compliance with current law and rules. Could you please clarify the highlighted information from your email below? I don't understand your description.

Thank you.
Jennifer

Jennifer LaMont
Tribal Certification Manager
Licensing Operations Division
Washington State Gambling Commission
360-486-3571

From: Ted Townsend [mailto:tt@bingostar.com]
Sent: Friday, February 08, 2013 3:46 PM
To: LaMont, Jennifer (GMB)
Subject: RE: Fortunet Remote Access

Hi Jennifer,

I just learned that GameTech did access system remotely for purposes of upgrades from time to time (e.g., if the tech couldn't get on site in a reasonable time). This evidently has not been done in several years. Also, we will not do access remotely for purposes of upgrades/trouble shooting in your State until you advise us we may do so.

Thank You,
Ted

From: Ted Townsend [mailto:tt@bingostar.com]
Sent: Wednesday, February 06, 2013 10:19 AM
To: Jennifer Lamont
Subject: Fortunet Remote Access

Good Morning Jennifer,

Allen Esparza asked that I research our remote access procedures and report back to you. In Washington State we use proprietary software by the name of HallComm to gain access. This software is used to dial into a DOS computer at a particular location. The DOS computer has two functions. One is to control video displays in a hall and the other is to house a modem. The modem is used to access the hall's sales files. Our accounting staff in Sparks Nevada dials into the modem and clicks on a button that is called "Retrieve Sales Files". This command initiates a stored procedure that automatically transmits the sales files back to Sparks. And that is it. From what I'm told we do not remotely access systems in Washington for trouble shooting purposes.

In quite a few other jurisdictions we remote in to perform trouble shooting but this is usually done through the hall's/casino's IT Department. Typically:

1. Bingo hall has an issue
2. Bingo hall sends trouble ticket via e-mail to IT Department
3. Bingo hall calls or e-mails nature of issue to Fortunet
4. Fortunet calls IT Department requesting access and states nature of problem
5. IT activates a port that will allow Fortunet to access the system
6. Fortunet dials or VPN's into the system and fixes the problem
7. Fortunet calls IT Department and tells them problem is resolved
8. IT Department closes the access port

IT usually is required to record begin/end of access as well as nature of problem and resolution. Also, the port usually times out after "X" minutes of inactivity.

I hope this helps. If you are considering allowing remote access for trouble shooting purposes, Fortunet fully supports the idea. With proper controls, remote access for trouble shooting is just as secure as accessing a system on site.

Thanks!
Ted

Ted Townsend, CPA
Director of Compliance
Fortunet, Inc.
3901 Graphic Center Drive
Las Vegas, NV 89118-1765
W: 702.201.1530 ext. 2010 C: 702.207.9760

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