

## Mentzer, Damon (GMB)

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**From:** Washington State Gambling Commission <no-reply@wsgc.wa.gov>  
**Sent:** Wednesday, January 17, 2024 3:33 PM  
**To:** Rules Coordinator (GMB)  
**Subject:** Webform submission from: Request a rule change

External Email

Submitted on January 17, 2024 - 3:32pm

Submitted by: Anonymous

Submitted values are:

**Petitioner's Name**

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**Rule Petition Type**

New Rule - I am requesting WSGC to adopt a new rule.

## New Rule Selection Function

**Subject or purpose of the rule**

To create regulatory structure to allow centralized surveillance of house banked card rooms under common ownership.

**The rule is needed because**

The Washington State Gambling Commission should initiate rulemaking to develop a regulatory framework to allow for centralized surveillance for cardrooms under common ownership. Centralized surveillance can help house bank card rooms with common ownership ensure compliance with regulations and maintain a safe and secure environment for guests and staff. A centralized surveillance operation better protects gaming operations and the public.

Centralized surveillance is an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for patrons – efficient and consistent operations across properties. Well-crafted centralized surveillance is designed to ensure that gaming is conducted in an honest, competitive, and safe environment – public safety is increased by providing a surveillance operator and supervision over the process within a

centralized room which would have a larger footprint than the current surveillance room model. Additionally, a centralized system will allow external regulatory access to enable gambling agents to review live footage, obtain necessary evidence in a timely manner without having to drive to individual properties to obtain footage, increasing efficiency and creating cost savings.

In the past, the need for separate surveillance systems was apparent. Separate systems provided additional functionality and security when systems were not capable of management from a central location. With today's digital IP systems, functionality has improved significantly. A single, networked system reduces cabling needs without restricting cabling distances.

**The effect of this rule change will be**

Updated Washington Administrative Code that better reflects the advancements in technology and opportunity for house banked card rooms under common ownership to implement centralized surveillance monitoring systems designed to ensure that gaming is conducted in an honest, competitive, and safe environment. This will provide an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for guests and staff.