



STATE OF WASHINGTON
GAMBLING COMMISSION

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

April 28, 2020

Sent via email: ANicholls@nrttech.com

Andrew Nicholls
NRT Technologies, Inc.
3525 E Post Road
Las Vegas, NV 89120

RE: VL-PRO Regarding Commercial Placement Only - GET Submission #2211

Dear Mr. Nicholls,

On November 1, 2019, we received an application for review and approval of NRT Technologies, Inc. (NRT) VL-PRO for use in commercial and tribal gaming facilities in Washington. This letter addresses commercial placement only. You will receive a separate letter from us regarding VL-PRO's placement in tribal gaming facilities.

On February 5, 2020, Special Agent J. Kerkof sent you an email outlining how some of the features of the VL-PRO were not compliant with rules and laws for commercial use in Washington.

On approximately February 14, 2020, your representatives made the following changes to the VL-PRO in our lab to address the areas of non-compliance:

- Installed the Casino Vision Premises Server or "cloud" server onto a server in our lab and
- Removed the surveillance module from the visual limits interface.

We tested and reviewed the modified equipment as noted above for compliance with rules and laws. We determined that the VL-PRO, as modified above, is not gambling equipment, and therefore, would not be required to be approved prior to being deployed in commercial gaming facilities in Washington as long as:

- The Casino Vision Premise Server is installed locally within the casino and not connected to the cloud or the internet; and
- The surveillance module in the Casino Vision Premise Server is removed and is not accessible; and
- Cameras are not installed in the VL-PRO; and
- There is no connection to the surveillance system; and

- The Casino Vision Premise Server is not connected to the casino's internal network with access to their email server. An email server would need to be created and setup on the premise server in order for users to reset their password.

Our determination is based solely on the modifications of the VL-PRO equipment submitted and identified above. If the VL-PRO is set up and operated in commercial gaming facilities in Washington in any other fashion than as outlined above, the VL-PRO would be in violation of our rules and laws.

Any modifications made to the VL-PRO are not covered by this determination and would require submission for additional testing and review. We reserve the right to investigate and re-evaluate this equipment if we determine that such a review is necessary to ensure compliance with applicable rules and laws.

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, Regulation, and Enforcement Division

cc: Jim Nicks, Agent in Charge, Regulatory Unit
Cathy Harvey, Agent in Charge, Tribal Gaming Division
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