



Concise Explanatory Statement

Notice of Permanent Rule Changes Related to Card Shuffling Devices

A new rule was adopted to allow card shuffling devices to connect to a secure cellular network for billing purposes.

This explanatory statement concerns the Washington State Gambling Commission’s adoption of WAC 230-16-152- Card shuffling devices connecting to a secure cellular network for billing purposes.

The Administrative Procedure Act ([RCW 34.05.325\(6\)](#)) requires agencies to complete a concise explanatory statement before filing adopted rules with the Office of the Code Reviser. This statement must be provided to anyone who provided comments regarding the proposed rule-making.

Once persons who provided comments during this rulemaking have had an opportunity to receive this document, the Washington State Gambling Commission will file the adopted rules with the Office of the Code Reviser. These changes will become effective on August 15, 2019.

The Washington State Gambling Commission appreciates your involvement in the rule-making process. If you have any questions, please contact Ashlie Laydon, Rules Coordinator, at ashlie.laydon@wsgc.wa.gov or (360) 486-3473.

What are the agency’s reasons for adopting this rule?

The rule was adopted to allow card shuffling devices to connect to a secure cellular network for billing purposes. This offers a new billing option for card shufflers found in licensed card rooms. The new rule defines “secure cellular network” and “billing purposes”, identifies what shuffler data will be transmitted, and outlines requirements that must be followed.

Summary of all public comments received on this rule proposal and consideration of the comments. If we responded to comments, add our response and how the final rule reflects consideration of the comments or why it fails to do so.

Public Comment:

Stakeholder meetings were convened on March 20, 2019 and April 26, 2019. Staff and stakeholders discussed adopting a new rule rather than amending WAC 230-16-151 because this is specific to billing information, not standard maintenance. Stakeholders expressed interest in expanding the scope of this new rule to include other types of gambling equipment,

other types of secure networks (such as VPN), and to allow connection for purposes other than billing (such as diagnostics), however these concerns are outside of the scope of this petition and can be addressed in the future.

Victor Mena, Washington Gold Casinos, testified at May 2019 Commission Meeting in support of this proposal.

No response was issued by the Washington State Gambling Commission.

If there are variances from the proposed rule and final adopted rule, state the reasons for the differences (RCW 34.05.325(6)(a)(ii)).

No changes were made.