Submission to:

Independent Gambling Authority

Topic: Inquiry into Smartcard Technology



By:



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SUMMARY





Gambler Subtle Assist the Personal, Community & Industry Solution

A web based card technology developed by AMC Convergent IT

GSA Technology



GSA Technology

- Web based card or access method technology
- Dumb Card, minimum magnetic card to act as a key to turn on system.
- Works with "smartcard", or any identification means; biometric or otherwise, that can interact with the EGM, key rings, USB devices, etc.
- Active & Passive modes.
- Intervene with or without EGM firmware changes using funds acceptor "inhibit" or "enable".
- Central intelligence, enablement, power & flexibility – Web based portal.

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Capabilities



Capabilities

For the Gambler

- · Pre-commitment put into practice
- Player pauses (circuit breakers) direct (active), indirect (passive).
- · Gambling duration and cumulative spend status screen messages
- Exclusion
- · Eliminate underage gambling
- · Identification of "at risk" and problem gamblers
- · Direct support to those who need it
- · Rehabilitation tool
- · Activity statements

Technological Architecture

- Extensible to multiple gambling modes
- · Central intelligence
- · Population database
- · Changes to system immediate
- Actively protect players pre-commitments without requiring EGM firmware change using acceptor inhibition.

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Precommitment



Precommitment (voluntary, universal, or mandated; with or without voluntary overrides)

- Time Limits (session, daily, weekly, monthly)
- Player nominated inter-sessional time interval
- Spend Limits (session, daily, weekly, monthly, yearly)
- · Maximum bet
- · Machine denominations
- Specific day exclusions
- · Gambling mode exclusions
- Total exclusions
- Player pauses. Player nominates timing and duration of pause. (Acts as circuit breaker to loss of control episodes)
- Messages on duration of play, cumulative spend (via direct to EGM, SMS, Email & Screen one or more)

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Exclusion



Exclusion

- Effective exclusion; single venue or all (voluntary, statutory or Protection Act, or as mandated).
- Access denied by flag in system on the portal.
 (not dependent on sighting card)
 (available in <u>ACTIVE</u> & <u>PASSIVE</u> modes)

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Other critical capabilities



Other Critical Capabilities

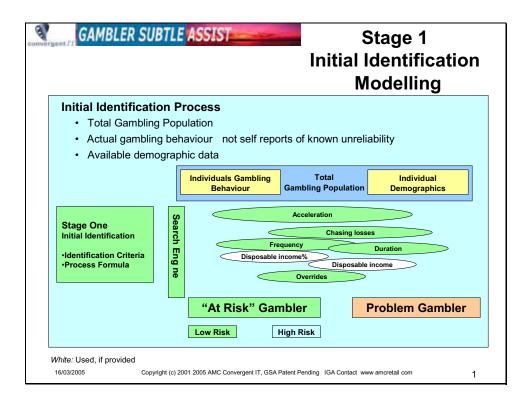
- Identification of "at risk" and problem gamblers.
- Support services directed to identified patrons, even under anonymous card options.
- Pre-commitment decisions in hand players.
- Activity statements, on request via Internet or regular (post, email) over any period.
- Database as research tool.

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Identification, psychological & psychiatric modelling



Rules of Engagement



Messages

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3. Or as mandated.



Rules of Engagement

Messages sent prior to limit reached

- Encourages player to make responsible decisions for themselves rather than be dependent on their behaviour being managed by system actions when limit is reached.
- Alerts them to impending shutdown so there is less likelihood of adverse reaction once access denied
- Informs gambler how to change pre-commitments and time delay. Reminds them they are in control
- Above all else provides a catch-all.

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Impact on recreational players



Impact on recreational gamblers acceptance and enjoyment

- Universal acceptance of cards, therefore GSA card is seen as the preferred system "key", rather than facial recognition, etc.
- Gambler Cards will undoubtedly add enjoyment to the ritualistic and superstitious aspects of gaming.
- Set & modify own pre-commitment with safety mechanism.
- Catch-all (Identification & "at risk" players).
- Activity statements "on demand" on the web, kiosks.
- Passive & Active modes (graded levels of intervention).

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Impact on licensees, employees and non-players



Impact on licensees, employees and non-gamblers

 Take pressure off the venue staff from onerous and impossible responsibilities (active)

(Passive mode needs venue staff to enforce exclusion & pre-commitments compared to <u>automatic</u> (EGM) enforcement in Active mode. This may add to work in venue & potentially involvement in possible confrontational events.)

- Increase staff morale when industry seen as more responsible and not contributing to destruction of individuals and families.
- Reduces legislative burden.
- Long term security as Industry becomes sustainable.

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Lost cards, tourist visitors, card fraud



Impact on lost cards, tourist visitors, card fraud

- · No value on card. No trade in cards
- Temporary visitor cards (international, interstate, pensioners)
- Lost cards. Data resides centrally not on card. Replacement cards preserve the history, exclusions and limits as were applied to the original.
- Cards renewed annually (configurable).

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Industry and Community benefit

GAMBLER SUBTLE ASSIST

Industry and community benefit

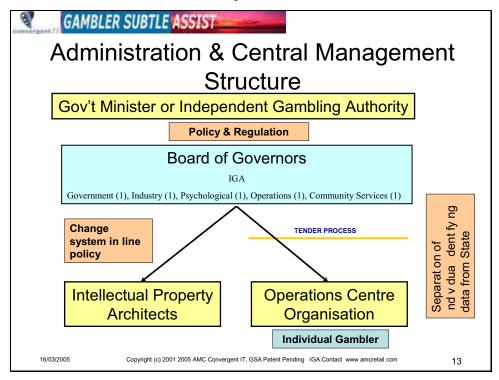
- More profitable use of venue as more patrons comfortable to frequent venues when industry seen as more ethical or less socially damaging.
- Identify & actively direct assistance to "at risk" & problem gamblers.
- Shifts revenue base from problem gamblers to nonproblem gamblers, making the industry ethically and economically sustainable.
- Large reduction in social cost of problem gambling.
- Gambling ethically, legally and economically sustainable.
- Flexible to change with changing needs quickly and cheaply – no card recall to bring effect to change.

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Possible Administration & Central Management structure



Implementation time frame



Implementation

- Card readers or access method installed 12 months.
- Cards issued ongoing, commencing 3 months before activation date.
- Final specifications determined, EGM firmware changes (Active 2) if required or integration acceptor inhibition (Active 1) – 6 months (overlapping) (active mode only)
- · Legislative changes, if required.
- · Public consultation & education.
- Venue and staff training.
- Less than 12 months time frame.

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Costing – non equipment



Balance of costs

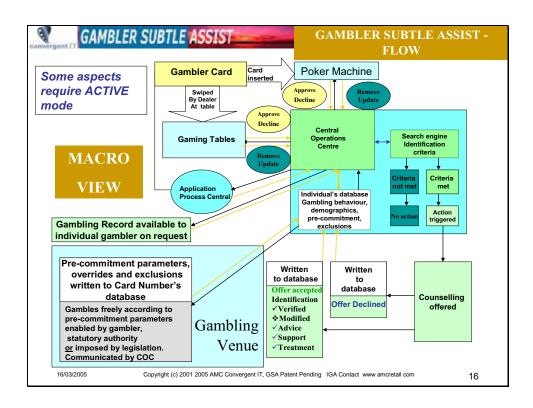
- All costs related to the identification processes of GSA, <u>except</u> machine & some card/entry method information data entry, are met by the patron or an EGM levy, this covers:
 - Operational costs,
 - Telecommunications costs,
 - Psychological profiling features,
 - Central equipment amortisation & maintenance,
 - Royalties & licensing costs
- Counselling costs borne by government or industry are separate from GSA.

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Schematic block diagram of GSA



Card issuance



- · At venue, GSA point or mail or Internet.
- Complete form card option 1 or option 2.
- Nominate any pre-commitment parameters or exclusions
- Venue barring(statutory powers and Act) written to individual database
- If Internet or mail applicant <u>must</u> pick up card & show proof of age, ID and correct any errors in application.
- If GSA point or Venue approach operator with completed form (process is 4min initial take on, 2 min renewal):
 - checks the form,
 - keys the information,
 - verifies the method of ID (checking photo ID), in option 2 records details of method of ID,
 - corrects any errors including player already on file.
- Player uses kiosk or Internet to set their PIN & limits, if desired.
- Host GSA system activates card immediately it is issued.
- Player goes and plays.
- Destroy paper form (privacy).
- Commence enrolment 3-4 months before activate.

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Card changes

GAMBLER SUBTLE ASSIST Card changes

- · At venue, GSA point, mail, kiosk or Internet.
- Process is:
 - Provide number,
 - Password enter if using Internet or Kiosk method.
 - Change allowed fields
 - Limit increases may have a delay applied (policy).
 - · Limit decreases applied immediately.
 - · Exclusion immediate or policy.
 - Exclusion removal policy delay perhaps or GSA point.
 - Email automatic confirmation of changes where email address is known to system.
 - Most patrons may do self using kiosk & Internet.

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Extraordinary scenarios - Lost/Stolen, Left card, Bartered entry



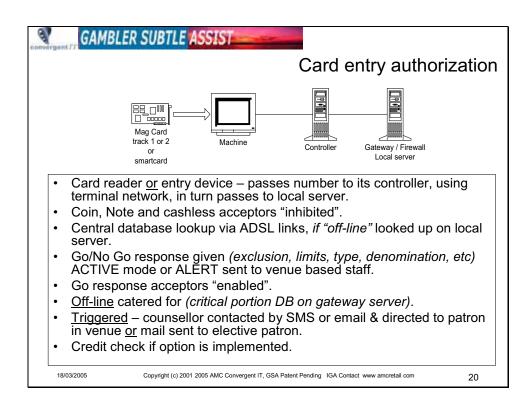
- Lost/Stolen entry method:
 - Reported lost by owner or handed in by finder.
 - System de-activates entry method.
 - Unlikely improper use due to PIN.
 - Reactivated
 - Owner goes to venue, ID verified by md5 encryption test.
 - · Entry method reactivated and returned to owner.
- Left entry method at machine:
 - After configurable set time of inactivity with entry method in machine GSA inactivates the method.
 - Reactivated see Lost entry method procedure.
- Bartered entry method:
 - Unlikely to be commercially viable for sellers.
 - Types of clients who would use are generally known to venue staff and this would create a suspicion.
 - md5 of verifiable encrypted data would detect the subterfuge.

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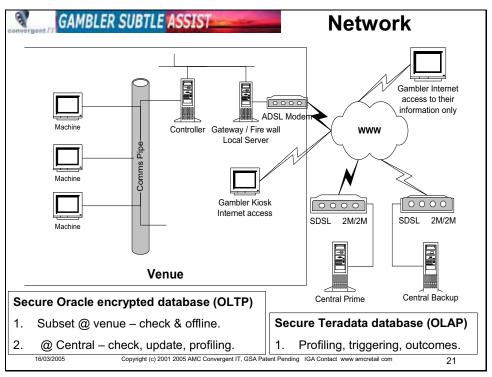
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Card entry authorisation



GSA network diagram



GSA designers and architects



GSA architects

- Dr. John Flanagan (Business & Technical)
 B.Sc.,B.V.Sc(hons) Chief Executive Officer AMCCIT Gambler Subtle Assist designer
- Mr. John Szymanski (Principal Psychologist)
 Registered Psychologist, B.Psych., Dip Ed., Univ of Western Australia Gambler Subtle Assist modelling designer

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GAMBLER SUBTLE ASSIST

Gambling is a legal recreational activity & business, the issues with "problem gambling" revolve around its <u>early</u> identification & the availability of assistance coupled with mechanisms enabling individual responsibility & accountability – "user pays" & a consumer protection approach.

Gambler Subtle Assist is the "catch-all" solution to the consumer protection issues & the emerging gambling community crisis irrespective of the access method to be used.

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Preamble

AMC Convergent IT has approached the challenge of gaming machine gambling from both a technological and psychological standpoint. AMCCIT has married its technological and psychological expertise to create Gambler Subtle Assist (GSA), which it considers is a complete solution to the challenge presented by this enquiry. It also considers enabling effective pre-commitment prevents actual harm. Harm being defined as spending more time or gambling more money than intended. By enabling gamblers to effectively manage their gambling behaviour, pre-commitment systems reduce the potential for recreational gamblers to develop into problem gamblers. By providing gamblers with gambling activity statements thus enabling gamblers to effectively budget time and money for their chosen recreational pursuit, GSA reduces the potential for recreational gamblers to become at risk or problem gamblers. GSA also puts into effect, reliable exclusion using technological intervention to prevent gambling by excluded players. GSA is not dependent on legal sanctions to ensure cooperation of excluded gamblers, or fallible human intervention by venue staff. Although beyond the prescribed terms of reference of this enquiry, GSA has the ability to identify "at risk" and problem gamblers from the total population of gamblers. AMCCIT would not do justice to any investigation into available technologies in the area of gambling harm minimization and prevention if we did not elaborate on this problem gambler identification facility of GSA in our formal submission.

The GSA systems, technologies, software and hardware described in this submission, are either in current commercial application, are weeks away from completion or fully developed. The implementation timeline and costing is provided in the body of the submission. In summary, GSA full implementation within the South Australian environment can be achieved within 12 months and Australia within 18-24 months or sooner depending on the resources allocated..

Abstract of GSA in essence

GSA technology is a commercially available system to facilitate "harm minimization" and "harm avoidance". The Gambler Subtle Assist product developed by AMC Convergent IT is a holistic approach to the complicated dynamics of the behaviour of all players and "at risk" and "problem gamblers", encompassing "card" technologies linked to a publicly accessible database. The database enables active intervention in

the player's gambling activities, access by the player for self monitoring, changes in pre-commitment and monitoring, identification of "at risk" and problem gamblers, as well as an objective population database of gambling behaviour. Unlike any other system, GSA is unique in its ability to identify "at risk" and problem gamblers. The population database and individual player gambling/gaming behaviour is used as the basis for applying "at risk" and problem gambler identification, modeled using complex psychiatric and psychological criteria. Individuals, "triggered" by the identification process are contacted, either within the venue or elsewhere by a variety of methods and counselling services offered to them. These same individuals and all gamblers can be presented with "targeted" on screen messages, particular and relevant to an individual's specific gambling behaviour and status. GSA enables gamblers to be blocked or excluded from gambling, either at the request of the individual gambler, the venue, under venue barring provisions or by the Courts.

GSA SUPPORTED SCENARIOS.

GSA can be configured in both active and passive modes.

In all modes, targeted messages and identification of "at risk": and problem gamblers are enabled. Under any mode, support can be directed to any identified players.

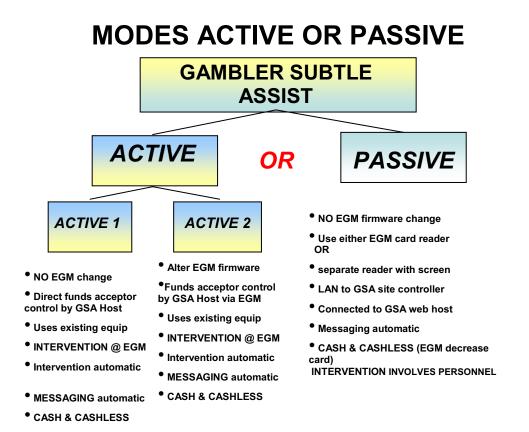
Within the active mode there are two implementations, "Active 1" and "Active 2".

Under the <u>active</u> modes, GSA is able to directly intervene in player activities, thereby bringing *direct* effect to a player's pre-commitments and exclusions. The <u>active 1</u> mode, uses GSA initiated and regulated direct control of the coin, note and cashless acceptors, the card reader and the data port information to either permit or inhibit player activity. This mode *does not require any firmware changes or manufacturer alteration to the EGM machine.*

The <u>active 2</u> mode uses GSA initiated and regulated control of the coin, note and fund acceptors, through the EGM, however, to achieve this, the EGM firmware requires alteration and thus the co-operation of the EGM manufacturers.

The <u>passive</u> mode records, compares and reports the player activity using the information set up on the GSA card player record, session history and the information obtained from the venue EGM site controller. It is passive because it cannot directly Copyright © AMC Convergent IT 2001 2009 Patent Issued Australia, New Zealand, Singapore, South Africa and Pending in other Jurisdictions

interact with the EGM or coin, note and cashless acceptors and therefore cannot directly <u>stop</u> the player from playing. Monitoring of pre-commitment limits, modeling and identification, "triggering" and referral to counselling components of GSA are all functional in the passive mode, however, intervention for exclusion breaches and pre-commitment limits depends on sound alerts and/or screen messages, reminding or alerting the gambler to desist or require venue staff to play a role.



Active 2 GSA is the <u>preferred implementation</u> as it makes use of potentially existing equipment and provides for a greater future flexibility to deliver further strategies which emerge through time.

Whether Passive or Active the fundamentals of GSA remain the same, the Internet Portal, the Player Self Maintenance, modeling, triggering, counselling direction all function.

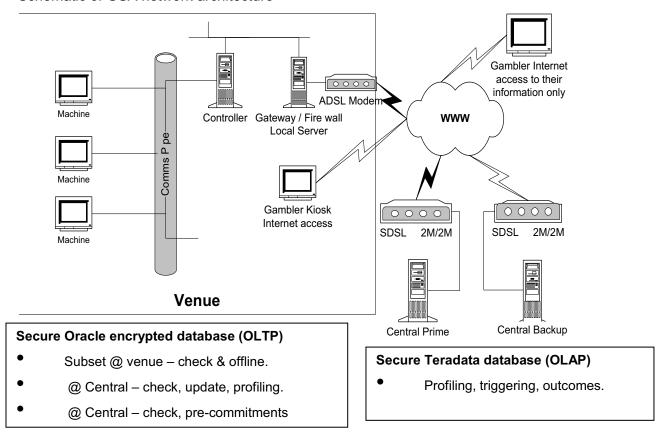
Table of GSA Mode Active or Passive versus function

FUNCTION	ACTIVE (1 & 2)	PASSIVE		COMMENT ON PASSIVE
PRE-COMMITMENT	V V	V	VENUE STAFF	Exception reports or Venue Staff directed to player.
PLAYER PAUSES	√√	√-	VENUE STAFF	Exception reports or Venue Staff directed to player.
DURATION & CUMULATIVE \$	√	V		
EXCLUSION	√	√	VENUE STAFF	Detects & directs staff to EGM on or invalidate card.
ELIMINATE UNDERAGE	√	√		
ID "AT RISK" & PROBLEM GAMBLERS WITH GSA MODELLING	√	√		
DIRECT SUPPORT TO PLAYER	√	√		
REHABILITATION TOOL	√	√		
ACTIVITY STATEMENTS	√	√		
EXTENSIBLE ALL FORMS GAMBLING	√	V		
CENTRAL INTELLIGENCE	√	√		
POPULATION DATABASE	√	V		
CHANGES IMMEDIATE EFFECT	√	V		
MESSAGES	√	√	BESIDE	Screen on side or EGM
ONE MACHINE AT A TIME	√	√	EGM	Configuration of EGM
SAFETY NET	√	√		
CASHLESS	√	√		
CASH	√	√		
PLAYER ACCESS OWN DATA	√	√		
PLAYER / AUTHORITY EXCEPTION REPORTS	1	V		

CENTRAL CONTROL

GSA is a web based card or other access method (radio frequency id, smartcard, biometric, etc.) technology which in its simplest form uses a magnetic stripe card coupled with (preferably) or without a PIN number to identify an individual's gambling activities at any venue within the jurisdiction. It monitors, and dependent on mode implemented, enforces pre-commitments the player has set. It records a player's gambling activities and even if anonymous, a triggered individual ("at risk" or "problem gambler") can be reached to provide assistance if necessary.

Schematic of GSA network architecture



An individual's information is set up and maintained on a central Oracle Database with a subset of that information stored on a "GSA controller" at each venue for *offline* procedures. In many instances the "GSA controller" used may be the existing "Site Controller" for the venue.

Large broadband Internet pipes into the *Central GSA Host site* bring and service the requests from each of the EGM machines located in each of the venues. Precommitments, exclusions and other player specific parameters are checked and validated at each EGM operation. Instructions to the <u>active modes</u> are initiated from

the Central server or in its absence the applications on the GSA venue controller or Site Controller. It is imperative for player acceptance the servicing of requests happens in a short period of time. Tests have shown the time taken over even dial up Internet links from the insertion to authorization or rejection of a player is of the order of 1 second. This is considered a more than adequate response time. To minimize delays and handle the large number of players, ten million Australia wide, an online transaction processing database (OLTP) has been selected, *Oracle*. Oracle is a robust secure database with full transactional recovery capabilities.

Offline procedures exist:

Should the Internet pipe not be available to the EGM machines for whatever reason, the functions are assumed by the applications on the GSA controller or site controller until the link is restored. Upon restoration, the activities during the activation of the *offline* procedures are updated onto the central server including all player sessions, pre-commitment levels, money activity and so on. No information is lost during these procedures. The architecture is such that the offline facilities can be replicated in any number of environments, including <u>designated remote areas</u>, such as Roxby Downs, thereby maintaining the integrity of the information and ensuring the functionality of GSA is available to protect all players at all times.

RULES OF ENGAGEMENT

The rules of engagement of the player with the card are developed.

The integrity of association of a specific player with a card is maintained through:

- 1. The use of a user changeable personal identification number (PIN).
- 2. The requirement to provide photographic identification at the time of collection of a GSA card.
- 3. The identity of a player can be confirmed at any time through the use of a secure identity check method that does not reveal to anyone personal information. This is achieved through the hidden encryption of the person's name & date of birth or name, date of birth & photographic identification details or some other combination. The information is entered at the time of application, converted to an encrypted 128 bit expression and stored. Should GSA or a venue operator suspect a player is using other than their card, the player can be requested to enter their name, date of birth, address and identification method details into a handheld device connected to the

GSA Portal – either the information matches or it does not. Should the information not match, the card is inactivated and any other appropriate action taken. The information entered by the player is not available in readable form to the venue or any other party.

PRE-COMMITMENT

GSA enables a player to set pre-committed limits and other factors on:

- 1. Session time and amount of spend, with or without voluntary overrides.
- 2. Inter-session time interval (Player pauses) the minimum time between the completion of one session and commencing a new one when either the session time limit or session amount spend limit has been reached.
- 3. Daily time and amount of spend.
- 4. Weekly time and amount of spend.
- 5. Monthly time and amount of spend.
- 6. Yearly time and amount of spend.
- 7. Machine denominations not to play.
- 8. Maximum bet in any one play.
- 9. Gambling/gaming mode exclusions.
- 10. Specific day or date exclusions, e.g. paydays
- 11. Exclusion either self imposed or regulatory or venue initiated.

Pre-commitments can be set at anytime; at application for a card, by the player accessing the Internet or from a kiosk or sending a request by mail. It is not a requirement of the technology that these be set by the player. A player may, unless mandated otherwise, elect to implement none, some or all of the GSA pre-commitment options. GSA can be configured to set *defaults* on any or all pre-commitment values at the time a GSA card is issued. Defaults may also be set by the body which has overall responsibility for the implementation and maintenance of the proposed gambler assistance system. GSA has the ability to identify "at risk" and "problem gamblers", and these gamblers, being readily identified, may have their limits set by such a third party. Any other specifically identified gamblers may have their limits set by an authorized third party. GSA can be configured to either allow or prevent subsequent changes in the default pre-commitments where defaults are enabled. The ability to allow or prevent pre-commitment changes can be set on either a *global* or *individual card* basis.

Any action by a player that relaxes a pre-committed limit can have its time of effect delayed by a configurable period of time. E.g. 24 hours, 6 hours, etc.

Any action, by a player, that tightens the restrictions or limits placed on precommitment are effective immediately or after a configurable period of time.

Under the GSA *active* modes pre-commitments are checked <u>before</u> each play and verified that the play will not cause a player to breach the limit they have set. Actions that can be taken depend to a large extent on the GSA mode of operation adopted. Passive mode can report but requires intervention of venue staff. Either of the active modes can prevent further play until the pre-commitment criteria once again allow play to proceed.

LIMITS and TARGETED MESSAGES

The initial wording and configuration of targeted messages to have the maximum potential positive impact for players is complete. Targeted messages support players approaching and reaching limits. Messages are constructed in such a way so as to encourage responsible decision-making to remain in the hands of players, rather than foster sole dependence on the prevention of play mechanisms of the GSA system.

EXCLUSIONS

The GSA technology puts into effect reliable exclusions. The excluded party's GSA card is inactivated, so cannot be used in EGMs or other gambling equipment thereby preventing excluded players from gambling. Importantly, an excluded player may continue to use the remainder of the venue – they simply cannot gamble.

Player exclusions, by their own request, through the legal authority of a regulatory body or by venue barring powers, are enabled by GSA technology. The robustness of the exclusion system currently operating in South Australia has already been questioned in the *Guide for making submissions*. Exclusion under GSA does not depend on cooperation or motivation on the part of the excluded gambler based on the threat of legal action. Apart from putting into effect reliable exclusions, GSA has the further advantage of removing the potential for excluded gamblers from entering the legal system.

The lifting of exclusion cannot be directly performed by the player through the Internet. As currently implemented, this requires access to the main portal by an operator of suitable privilege. Exclusion removal can be delayed for a variable period of time.

UNDERAGE PLAYERS

The requirement to furnish photographic identification proving a person is over the legal age at the time the person obtains the GSA card means it is not possible for minors to obtain a card and hence they cannot gamble.

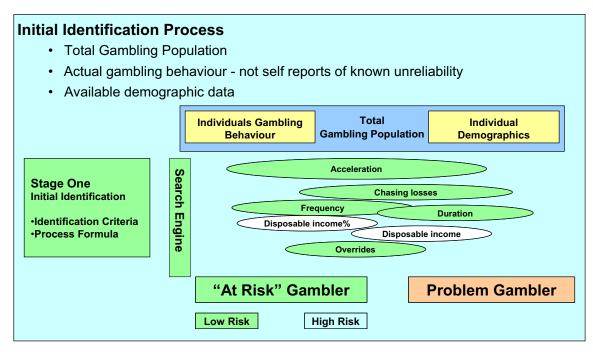
A mechanism is available to assist venue staff to check the authenticity of any gambler where it is suspected a minor is using a card provided by a third party. (Refer to point 3 of Rules of Engagement).

ONE MACHINE AT A TIME

GSA requires the card to be in the card reader in order for the machine to operate. Each player may only have one GSA card. Consequently, a player may only play a single machine at a time.

MODELLING

An essential component to GSA, beyond pre-commitment functionality is the modeling that determines if a player is an "at risk" or "problem gambler". This determination follows the application of many complex algorithms and iterations of the specific player's current and historical playing behaviour compared both to psychological and psychiatric criteria as well as population statistical behaviour. The actual algorithms are confidential commercial information, however, the factors taken into consideration consist of, amongst other factors, the following:



White: Used, if provided

Initial parameters for the various criteria have been established, the collection of field data on player behaviour following implementation will further refine these parameters.

Collection and analysis of player behaviour requires an extremely large database with sophisticated database tools to undertake the complex analysis. The large volume of information (terabytes) and large numbers of players necessitates a specific high volume OLAP tool, *Teradata* or *Oracle*, to perform this function.

The identification of a person as an "at risk" or "problem gambler" is only one step in harm minimization and avoidance. The second step is reaching the person concerned. As part of its holistic approach in addressing "at risk" and problem gamblers, GSA is designed to reach *triggered* players in a number of ways, either whilst they are actively playing or via SMS or email or at a nominated physical address. The identification and reaching capabilities of GSA, enable it to provide harm minimization and harm avoidance beyond its pre-commitment and exclusion functionality.

ACTIVE MODES OF GSA OPERATION

1.1 **Active 1**

The GSA Active 1 mode elements consist of:

- a) Dip card reader/writer for handling either magnetic strip cards (dumb cards) or smartcards with a 2 or 3 line minimum of 20 characters per line display with a PIN pad with digits 0 to 9 and CLEAR and ENTER (or accept) buttons installed in the EGM. The normal position is a standard provision by the EGM manufacturers. These elements are mounted in a sandwich panel or some other suitable mount and form part of the EGM cabinet.
- b) Coin, note or cashless acceptor(s) capable of operation through electronic signals for *enable* and *inhibit* functions as well as pulse or other means of detecting the value of a coin or note or cashless transaction inserted. The *default* state of the acceptor(s) is <u>inhibit</u>. These are normally part of the EGM and depending upon jurisdiction may be present or absent.
- c) A microprocessor controlled board developed by the GSA developers which both senses acceptor activity and can interact with the acceptor to the extent it can either set a signal to *enable* or *inhibit* the acceptor. If acceptor is inhibited the coin or note or cashless tender is rejected and returned to the depositor.
- d) The microprocessor controlled board is required to actively enable the acceptor. Unless the microprocessor controlled board generates the "enable" signal to the acceptor the acceptor remains in the "inhibit" state.
- e) The microprocessor controlled board is connected to and interacts with:
 - a. The GSA site controller;
 - b. The GSA Host system;
 - c. The coin, note and cashless acceptors through either a hardware wire patch panel or USB interface. The microprocessor controller shares this acceptor connection with the EGM, however, the Microprocessor controller board is <u>unable</u> to influence the EGM through this sharing, it can

only influence the ENABLE or INHIBIT signal of the ACCEPTORS;

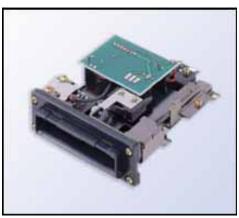
- d. The "dip" card reader;
- e. The message display mentioned in a).
- f. Power for the microprocessor board is obtained from the EGM power source, preferably split off prior to the power source to the EGM connecting to its specific components.



SAMPLE ELECTRONIC COIN ACCEPTOR



USB INTERFACE

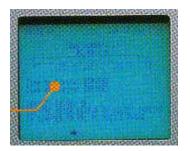




MANUAL INSERTED CARD READER/WRITER



PLAYER DISPLAY FOR MESSAGES - 2 line 20 character 10mm high.



PLAYER DISPLAY - MULTIPLE LINE FOR TARGETED MESSAGES



PLAYER PIN PAD - BACKLIT CHARACTERS VANDAL PROOF

1.1.1 Essentials

- 1.1.1.1 No changes to the firmware of the EGM are required, making this method independent of manufacturers.
- 1.1.1.2 Requires one or more of electronically controlled coin, cashless and note acceptors, where fitted.
- 1.1.1.3 Requires a dip card reader with a numeric pad for PIN entry and a 2 or 3 line by 20 or more character display in a sandwich panel fitted to the EGM. This panel is installed in the normally available slot or panel space provided by the different manufacturers.
- 1.1.1.4 Requires a printed circuit board mounted in the EGM, independent of the EGM bus and electronics connected through a hardware "patch panel" or USB connection to the coin, note and cashless (card reader/writer or token) acceptors (if fitted) and the dip card reader.
- 1.1.1.5 The card reader and PIN in 1.1.1.3 is connected to a PC (GSA controller) in the venue by a direct wire or wireless or some other form of connection or area network.
- 1.1.1.6 The GSA controller in the venue is connected to the Internet using a Broadband (ADSL) connection.
- 1.1.1.7 The ADSL connection points to the GSA URL and communicates directly with the GSA online database.
- 1.1.1.8 Data port connection to the Site Controller in the venue and the continual reading in real time the XML or other format data output from the data port and its transmission to the GSA Host and on site GSA controller (for offline purposes if required).
- 1.1.1.9 Neither the EGM machine firmware nor communications to the Site Controller (*Data Port*) are altered, hence any certification requirements, *if any*, should be relatively minor.

1.1.2 Mode of Operation -

- 1.1.2.1 Coin and note and cashless acceptors are <u>inhibited</u> from accepting either coins or notes or cashless tokens or further coins or notes or cashless tokens unless:
- 1.1.2.2 A GSA card is inserted into the dip card reader;
- 1.1.2.3 The inserted GSA card is not from an excluded party;
- 1.1.2.4 The card is not stolen, damaged or expired;
- 1.1.2.5 Pre-commitment limits set, *if any apply* to the card, have not been reached:
- 1.1.2.6 Any inter-session time player pause is not in force for this card;
- 1.1.2.7 The coins or notes or cashless tokens already inserted for this particular play do not exceed the maximum bet or amount of spend in relation to this session, day, week, month or year.
- 1.1.2.8 Any targeted screen messages have been displayed on the sandwich panel for the configured time;
- 1.1.2.9 The player is not a person "triggered" by the GSA modeling and identification process whether to stop player or direct counsellors to the player is configurable;
- 1.1.2.10 Once the coin, note and cashless acceptors are *enabled* by the GSA electronic components and system, the EGM controls the coin, notes and cashless playing as it does currently. This includes the EGM ability to inhibit the coin or note or cashless acceptor.
- 1.1.2.11 The process described in 1.1.2 does not alter or impact or interfere with the operation of the EGM and its firmware at any point. There is no potential point of fraud, manipulation or compromise of the integrity of the EGM firmware or mechanics of operation. The GSA process in 1.1.2 enables or prevents play by the gambler by stopping depositing of coins or notes or cashless tokens into the EGM through its standard peripherals the coin, note and cashless acceptors.

1.1.2.12 If none of the excluded party, invalid card, triggered party or precommitment action required criteria are activated the *inhibit* signal to the coin and note and cashless acceptors are dropped. The coin, note and cashless acceptors will then process the currency according to all the other rules inbuilt into the EGM and the coin, note and cashless acceptors discrimination as currently occurs.

1.1.3 **Method**

When the GSA system sets the inhibit signal high in the coin acceptor, any coins inserted are rejected and pass to the coin return receptacle. Similarly, in the case of a note acceptor when the GSA system holds the inhibit signal high any note inserted is rejected and returned to the player.

Similarly, in the case of a cashless acceptor when the GSA system holds the inhibit signal high any cashless token (*in whatever form;* token, smartcard, ticket or other) is rejected and returned to the player.

In a coin acceptor, if GSA sets the inhibit signal high whilst coins are in a stream any coins entering the coin acceptor validation area are rejected once the signal is raised. Similarly in the case of a note acceptor, if the denomination inserted will exceed a pre-commitment value the note is rejected. Similarly in the case of a cashless acceptor, if the denomination inserted will exceed a pre-commitment value the cashless token or currency transfer to the EGM (*in whatever form token, smartcard, ticket or other*) is rejected.

The EGM requires funds in order for play to occur. Through this mechanism (acceptor inhibiting), GSA is able to enforce a player's precommitments by simply preventing funds from being deposited into the EGM. In this active mode, GSA does not affect any other aspect of the EGM or its operation.

GSA continually receives input from the Data Port output via the EGM venue Site Controller as to what the gambler played, including numbers of lines, denomination of machine, credits won credits lost and credit balance. This information is used in GSA to monitor, and put into effect the pre-commitments set by the player and in the GSA modeling identification of "at risk" and "problem gambler" criteria.

In this mode, GSA is *aware* of the denomination of the money or funds being accepted, where the money acceptor uses a pulse technology to inform the EGM of the money value inserted. GSA knows the amount of the proposed spend by the player <u>before</u> any play has been initiated on the EGM, hence GSA is able to *inhibit* fund acceptance once a precommitted maximum spend amount or time limit has been reached.

1.1.4 **Technology Availability**

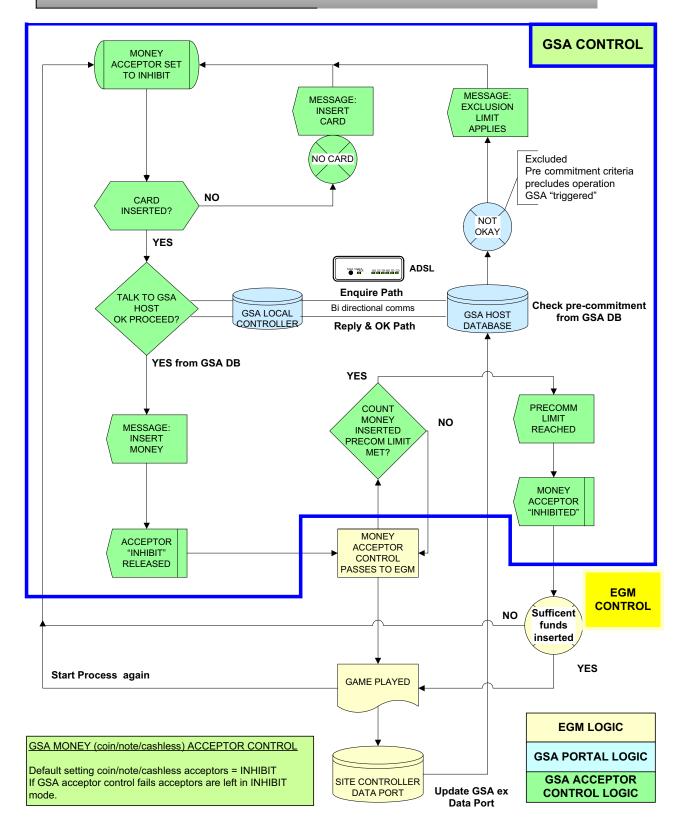
- 1.1.4.1 The required technology components are immediately available.
- 1.1.4.2 Electronic coin, note and cashless acceptors are compatible in most cases with the GSA <u>Active 1</u> mode; however should it prove for any specific manufacturer's machines the acceptors are not compatible, relatively inexpensive Microcoin QL coin acceptors and other coin, note and cashless acceptors (approved for EGM use) are confirmed capable and available.
- 1.1.4.3 The coin / note / cashless acceptor inhibit controller is prototype capable of inhibiting each of a coin, a note and a cashless acceptor where fitted in an EGM and requires only to be put into production for implementation.
- 1.1.4.4 The dip card reader / PIN pad and sandwich insert is available.
- 1.1.4.5 GSA Host services and pre-commitment, modeling and identification and controlling Internet based applications are available. Including the player web based self maintenance applications.
- 1.1.4.6 Some "house-keeping" functions of GSA require development, all of which can be completed including testing within a 6 month period.

1.1.5 Implementation

- 1.1.5.1 The GSA Active 1 solution installation could commence within 3 months of a requirement to implement.
- 1.1.5.2 Completion of GSA Portal functions 6 months.

Gambler Subtle Assist Active 1 Control Flow

Gambler Subtle Assist - Active 1 Control Flow



1.1.6 **Features**:

At no point in the process is the EGM process integrity or one of its internal firmware processes impacted upon, other than whether money can be inserted into the machine or not.

COIN or NOTE or CASHLESS ACCEPTOR STATUS	OPERATIONAL OR PLAYER CONDITION	
INHIBIT	NO CARD INSERTED	
INHIBIT, PENDING STATUS RESULT	CARD INSERTED, CHECK PIN, and CARD STATUS	
INHIBIT	EXCLUDED	
INHIBIT	SESSION AMOUNT LIMIT	
INHIBIT	SESSION TIME LIMIT	
INHIBIT	DAY AMOUNT LIMIT	
INHIBIT	DAY TIME LIMIT	
INHIBIT	WEEK AMOUNT LIMIT	
INHIBIT	WEEK TIME LIMIT	
INHIBIT	MONTH AMOUNT LIMIT	
INHIBIT	MONTH TIME LIMIT	
INHIBIT	YEAR AMOUNT LIMIT	
INHIBIT	YEAR TIME LIMIT	
INHIBIT	MACHINE DENOMINATION DECLINE	
INHIBIT	GAMBLING MODE LIMIT	
INHIBIT	SPECIFIC DAY OR DATE EXCLUSION	
ENABLE	None of the above is true, money can be inserted.	
	Money inserted reaches a pre-commitment limit.	
CHANGE ENABLE TO INHIBIT	Status changes to INHIBIT on coin or note that	
STRINGE ENGINEER TO HATIBIT	reaches limit.	
	Credits inserted whilst ENABLE are played	
	Between EGM plays whilst GSA Portal processes	
INHIBIT	player information from DATA PORT and checks	
	LIMITS.	
	If no limit reached at last play. Acceptor status	
ENABLE	changed to ENABLE.	
	OK to PLAY	

The GSA Active 1 mode components are electronically isolated and independent from the EGM, its firmware and game, save for the sharing of control of only the INHIBIT signal of the coin, note or cashless acceptors and the power supply.

In the event of a failure of a GSA Active 1 mode component the acceptors are set to the INHIBIT mode.

1.1.7 Costs of Hardware elements (indicative) excluding GST:

1.1.7.1	Coin acceptor, if required	\$ 204.00
1.1.7.2	Hardware wiring patch	\$ 16.00
1.1.7.3	GSA microprocessor acceptor controller	\$ 600.00
	Interacts with GSA Host & acceptors.	
1.1.7.4	USB PCI option, if applicable	\$ 160.00
	(Not require 1.2.9.2)	
1.1.7.5	Card reader/PIN buttons sandwich panel	\$ 500.00
1.1.7.6	Cables	\$ 50.00

TOTAL

\$1,530.00 including coin acceptor

\$1,150.00 excluding coin acceptor

1.2 **Active 2**

1.2.1 Essentials

- 1.2.1.1 Requires changes to the EGM firmware to enable:
- 1.2.1.1.1 Requirement for card to be inserted prior to EGM operating.
- 1.2.1.1.2 Card status to be checked with GSA Host prior to accepting coins, notes or cashless betting stake.
- 1.2.1.1.3 Card status to be acted upon, e.g. exclusion not enable EGM, session limits, etc.
- 1.2.1.1.4 Display of targeted messages from GSA Host to player on EGM.
- 1.2.1.1.5 Data Port communications to be bidirectional.
- 1.2.1.1.6 Update of GSA Host each play of the machine.
- 1.2.1.1.7 Wait for OK from GSA Host to the EGM, to enabling another play.
- 1.2.1.1.8 Communication to GSA Host when card is removed.
- 1.2.1.2 Each EGM (VLT or VGT) requires a dip card reader with numeric pad.
- 1.2.1.3 The card reader and PIN pad are connected to the EGM communication bus.
- 1.2.1.4 The EGM is to provide a machine number for location basis.
- 1.2.1.5 The EGM screen control needs to display the target messages to the player.

1.2.2 Mode of Operation

- 1.2.2.1 Each EGM or video lottery or video gaming terminal manufacturer would need to modify the firmware of the machine to facilitate the Essentials outlined in 1.2.1 above.
- 1.2.2.2 The *Mode of Operation* of <u>Active 2</u> is **exactly** the same as <u>Active 1</u> in section 1.1.2 *except* the EGM firmware discriminates between play and not play by acting directly on information from the GSA Host or GSA controller at the venue, whereas in <u>Active 1</u>, the GSA microprocessor controlled board sends the inhibit or enable signal to the coin, note or cashless acceptors to achieve the same results.

1.2.3 **Method**

- 1.2.3.1 The EGM firmware prevents play if a GSA card has not been inserted and remains inserted in the EGM card reader.
- 1.2.3.2 Upon a card being inserted in the card reader the EGM firmware initiates a communication through the venue site controller to the GSA Host. The EGM firmware communicates the card number, and if a smart card for cashless play is in use, the balance on the card to the GSA Host.
- 1.2.3.3 The EGM firmware does not allow play to commence until an OK is received from the GSA Host.
- 1.2.3.4 The EGM firmware is to direct any messages from GSA to the EGM video screen to display to the player. This could include player activity statements.
- 1.2.3.5 The EGM firmware is to communicate to the GSA Host <u>prior</u> to each play indicating the machine parameters (number lines, \$ spend) the player has selected and wait for an OK prior to allowing that play.
- 1.2.3.6 The EGM firmware acts to prevent play by a player when a signal is received from GSA that play should not proceed, following an enquiry at card insertion and between each play of the EGM by the same player.
- 1.2.3.7 Play to be prevented on receiving a signal from GSA that:
- 1.2.3.7.1 The player is an excluded person.
- 1.2.3.7.2 A session, day, week, month or year amount pre-commitment has been reached.
- 1.2.3.7.3 A session, day, week, month or year time pre-commitment has been reached.
- 1.2.3.7.4 Player pause has not expired.
- 1.2.3.7.5 The player has set a denomination and numbers of lines that if played would exceed the maximum bet the player has set as a precommitment.
- 1.2.3.7.6 The player has elected not to play on a machine of this denomination.
- 1.2.3.7.7 The player has elected to play on this specific day.

1.2.4 **Technology Availability**

- 1.2.4.1 Each manufacturer would need to agree to make the firmware changes, which whilst simple would take time and may be resisted.
- 1.2.4.2 The requirements are not currently provided for in the EGM firmware of any manufacturer.
- 1.2.4.3 No idea of cost is proffered, whilst one could guess it is not substantial.
- 1.2.4.4 The GSA Host and interactive components to interact with the EGM firmware are either in existence or could rapidly and economically be developed. In most cases the software is already available and in use in other applications.

1.2.5 Implementation

- 1.2.5.1 The firmware changes by the manufacturers and the re-certification of the EGM machines following such changes could reasonably be expected to take approximately 6 months, if not longer.
- 1.2.5.2 The fitment of the card reader and numeric pad would take some 6-12 months depending upon the resources made available to complete the 12,000 machines concerned.
- 1.2.5.3 The GSA Host and GSA venue controller software would take less than 6 months to complete and fully test any remaining outstanding functions.

1.2.6 Features

- 1.2.6.1 EGM firmware directly intervening and being an integral part of the GSA system, on the surface of it would seem to offer significant benefits. However, in reality, compared to Active 1 the Active 2 mode does not offer any greater functionality.
- 1.2.6.2 Because of the need for each manufacturer to make firmware changes, Active 2 is more complicated and takes longer to implement.

- 1.2.6.3 Active 2 is likely to require re-certification of the EGM machines, depending on the initial architecture of the firmware in each of the machine types.
- 1.2.6.4 Some may feel that enabling <u>bi-directional communications</u> on the **Data Port** may open the machines up to a risk of "hackers" gaining access. This should be viewed as an extremely unlikely possibility.

1.2.7 Costs of Hardware elements (indicative) excluding GST

1.2.7.1	EGM firmware modifications	\$ unknown
1.2.7.2	Card reader/PIN buttons sandwich panel	\$ 500.00

1.2.7.3 Cables \$ 50.00

TOTAL \$550.00 excluding EGM firmware change costs.

Modifications to the EGM firmware, due to the number of manufacturers involved Aristocrat, IGT and others, are expected to result in a per EGM machine cost similar to the <u>Active 1 GSA</u> mode cost without a coin acceptor if not greater.

1.3 Passive

The <u>Passive</u> mode has no interactive pathway with the EGM machine or any of its components, such as the coin or note or smartcard reader, with which to use to intervene in the player process directly.

The Passive mode is connected to the EGM machine <u>data port</u> and receives the information from each play as it has <u>occurred</u>.

This mode monitors the gambling behaviour of a player in real time and places that information before the player or venue staff or some other appropriately authorized body for action. Under GSA Active methods, this action or intervention is accomplished electronically by prevention of play and greater control over screen messages. Under GSA Passive mode, intervention is by venue staff or others.

1.3.1 Essentials

- 1.3.1.1 No change to the EGM firmware.
- 1.3.1.2 Requires a dip card reader with numeric pad and display screen.
- 1.3.1.2.1 Card insertion cannot be compelled electronically, but play without card insertion can be flagged to venue staff, via SMS, or screen module at cashier or other suitable location for intervention.
- 1.3.1.2.2 Card status checked with GSA. Blocked cards (excluded players), breached or reached pre-commitments are flagged to venue staff for intervention.
- 1.3.1.2.3 Targeted display messages from GSA Host to player displayed on Card Reader Screen.
- 1.3.1.2.4 Data Port communications remain unidirectional and is unaltered.
- 1.3.1.2.5 GSA Host is updated each play of the machine.
- 1.3.1.2.6 Card insertion is recognized by GSA.
- 1.3.1.2.7 Card removal is recognized by GSA.
- 1.3.1.3 The card reader and PIN pad are connected to Data Port of Site Controller.

- 1.3.1.4 The EGM provides a machine number for location identification in the Data Port information currently sent to the communications port.
- 1.3.1.5 No changes required to the firmware of the EGM, making this method independent of manufacturers.
- 1.3.1.6 Other requirement as per Active 1 minus components pertaining to the coin or note or cashless acceptor.

1.3.2 **Mode of Operation**

- 1.3.2.1 Gambling can continue whether a card is inserted or not inserted into the dip card reader.
- 1.3.2.2 Venue staff are alerted if
- 1.3.2.2.1 A card is not inserted in card reader or
- 1.3.2.2.2 The inserted GSA card is from an excluded party;
- 1.3.2.2.3 The card is stolen, damaged or expired;
- 1.3.2.2.4 Pre-commitment limits set, *if any*, applying to the card have been reached:
- 1.3.2.2.5 Any inter-session time player pause is in force for this card;
- 1.3.2.2.6 The coins or notes or cashless tokens already inserted for a particular play exceed the maximum bet or amount of spend in relation to this session, day, week, month or year.
- 1.3.2.2.7 The player is a person "triggered" by the GSA modeling and identification process.
- 1.3.2.3 Targeted messages are displayed on the sandwich panel for the configured time.
- 1.3.2.4 The process described in 1.3.2 does not alter, impact or interfere with the operation of the EGM and its firmware at any point.

1.3.3 **Method**

- 1.3.3.1 Prevention of play can only be achieved by intervention by venue staff or other persons.
- 1.3.3.2 Card insertion into card reader initiates a communication through the venue site controller to the GSA Host.
- 1.3.3.3 Only play that is temporally contiguous with period of card insertion is linked to card number and therefore unique player.

- 1.3.3.4 GSA Host directs any messages from GSA to the Card Reader Display Screen.
- 1.3.3.5 Venue staff, via SMS or display screen or other electronic communication means can receive a signal from GSA that:
- 1.3.3.5.1 Play is occurring on an EGM whilst no card is inserted in card reader
- 1.3.3.5.2 The player is an excluded person.
- 1.3.3.5.3 A session, day, week, month or year amount pre-commitment has been reached.
- 1.3.3.5.4 A session, day, week, month or year time pre-commitment has been reached.
- 1.3.3.5.5 The player has set and played a denomination and numbers of lines exceeding the maximum bet the player has set as a precommitment.
- 1.3.3.5.6 The player has elected not to play on a machine of this denomination.
- 1.3.3.5.7 The player is playing on a day that has been blocked.

1.3.4 **Technology Availability**

- 1.3.4.1 No EGM firmware changes necessary
- 1.3.4.2 All necessary hardware components readily available.
- 1.3.4.3 Same requirements as in Active 1 except for the components related to coin and note and cashless acceptors.

1.3.5 Implementation

- 1.3.5.1 The fitment of the card reader and numeric pad would take some 6 months depending upon the resources made available to complete the 12,000 machines concerned.
- 1.3.5.2 The GSA Host and GSA venue controller software would take less than 6 months to complete and fully test.

1.3.6 Features

- 1.3.6.1 Simpler implementation than Active 1 or 2. Enforcement of precommitment, depends on screen messages and intervention by venue staff or other persons.
- 1.3.6.2 Screen messages are more limited, with the small size of Card Reader Display Screen when compared with the ability to use the EGM screen under the Active method 2.
- 1.3.6.3 "At risk" and "problem gamblers" are identified, and support directed to them, in the same manner as the Active modes.
- 1.3.6.4 No re-certification of the EGM machines necessary.

1.3.7 Costs of Hardware elements (indicative)

1.3.7.1	GSA microprocessor acceptor controller	\$	600.00
	Interacts with GSA Host & acceptors.		
1.3.7.2	Card reader/PIN buttons/Player display sandwich panel	\$	500.00
1.3.7.3	Cables	\$	50.00
TOTAL		\$1	,150.00

4.3.3 On Technical Capability

GSA state of play or where it is up to; as described in this document has been developed and the various operating modes, Active 1 and Passive, have been tested using EGM emulation and simulation models. The "inhibit" and "enable" of the coin and other acceptors has been extensively tested using these emulators connected to a Microcoin QL coin acceptor and pre-manufacture GSA Microprocessor Controller card. The simulations have shown all the pre-commitment regimes are supported and behave as designed. There is nothing in the design that is peculiar to a specific acceptor save the ability to raise an electronic signal to inhibit its operation and lead to rejection of the funds a player is attempting to insert no issues with similarly capable acceptors fitted to EGM machines are anticipated, although they do need to be tested. In Active 1 and Passive modes GSA does not connect directly to the EGM and no interference with the EGM operation is considered possible, although this needs to be confirmed through some testing. The preferred Active 2 utilises the screens, pin pad, coin/note acceptors and other hardware where fitted by the EGM manufacturer.

The GSA Portal software including the "at risk" and "problem gambler" identification and modelling software has all been extensively tested and is in a position for implementation and deployment.

Reliability and Security of proposed hardware elements:

1. Manual Insert Card Reader/Writer

The proposed card reader/writer is of the manual insert type ("dip") in which the card is inserted and remains inserted in the reader for the duration of the session of the player.

The card reader proposed is capable of reading and writing to smartcards.

Reliability: versions of the manual insert card reader/writer are available that support between 500,000 and 3,000,000 cycles between failures. To some extent this depends on environment issues and price can become a determining factor.

Error rates are less than 1 read error per 100,000 bits of card data conforming to ISO 7811-5. The error rate excludes operator issues.

Security: the card reader is controlled by the Microprocessor board and it reads the card contents; the card number information is passed to the GSA site controller as a secure message packet and forwarded as a secure message to the GSA Internet Host. The information direction is controlled within the GSA hardware and there is no non-secure pathway whereby any other device or application can access to the information held on the Portal or influence the coin or note or cashless acceptors. Even a person attempting to fraudulently obtain the card information stored on the portal by placing a device between the Microprocessor controller and the local area network connection to the GSA site controller to skim card details is thwarted by the encryption security used. Any attempts to "skim" details would be clearly in the public view.

The manual insert card reader or reader/writer is housed inside the EGM cabinet and is hence secure from external party tampering or interference.

Without a properly authorized GSA card the various coin, note or cashless acceptors remain in an "inhibited" state (the default state) under the active GSA modes.

2. Card

Reliability:

GSA utilises either magnetic cards that are read only, or read/write or smartcards that are read/write. The cards are highly reliable. However, as with any card, such as credit cards, reasonable player care needs to be exercised – avoid magnets, avoid placing in plastic and static electricity.

Security:

a. The GSA card in its simplest format, a magnetic stripe card, contains only the GSA number which has no financial use other than for playing EGM machines following authorisation by the GSA Portal Host. It contains no money or personal details of the player. In one form the information used to verify the player may be stored in the magnetic stripe of the card in an md5 encrypted format.

- b. Can one player obtain more than one GSA card? GSA makes use of the player full name, date or birth, address and method of photographic identification at registration in a series of combinations. The information is converted to upper case with spaces removed and encrypted using the md5 128 bit encryption algorithm which is a one way encryption. A person using a card can be verified by checking this information against the player entering the information in an md5 calculator and the results compared with the player encrypted result held on the GSA Host. Each of the combinations created at the time the player card was initially issued and stored in non human readable form (md5) on the GSA Host are compared and a positive result on any one of the combinations leads to a more detailed investigation process prior to the issuing of the card to the player.
- c. A personal identification number (PIN), which is user changeable, is used in conjunction with the insertion of the card into the dip card reader, thereby ensuring cards cannot be copied and used or fraudulently produced or lost cards used by the finder. The PIN is stored separately from the card, being held on the GSA host, and is not written to the card. An individual player's GSA card PIN can be changed by that person on the GSA Portal under secure controls.

This access methodology ensures that the person inserting the card into the dip card reader <u>must</u> also know the PIN number. Thus there are 2 dependent pieces of information essential to access the EGM that are stored on physically separate devices. This prevents fraudulent usage of GSA cards through copying or theft or the use of cards that have been either *left* in the EGM machine or lost by a player. A person other than the authorised player could only use another player's card with either the knowledge or carelessness of the player whose card it really is.

Biometric reading devices can be connected to the GSA

Microprocessor controller card (GMCC), see below, and a biometric
identification imprint stored on the magnetic stripe or smartcard
inserted into the manual insert card reader to unambiguously resolve
this issue. Such biometric devices can be fingerprint, iris scans or

facial feature recognition, however, one should question whether this extent is either desirable or required. The incremental cost of including biometric reading devices at each EGM machine would be extremely high for what must be considered a small gain in security based upon the low incidence of such fraudulent practices unless it proves the prevalence is considerably higher.

3. GSA Microprocessor Controller card (GMCC) (not required in Active 2)

The printed circuit board card contains a microprocessor and is placed inside the EGM machine obtaining mains power from a common source and is neither directly nor indirectly connected to the EGM communications bus. Consequently, the GMCC cannot be influenced by a communication from an external device via the EGM communication bus as there is no connection. The GMCC and the GSA site controller communicate using secure messages that cannot be decrypted and there are no ways in which a non-GSA device can connect to the GSA controller or GMCC. The messaging between the devices is a "challenge – response" format and the connection TCP/IP.

The GMCC provides a 12 volt DC signal to the coin, note and cashless acceptors and provides power to the player display to which targeted player messages are sent. The GMCC provides connection to the dip card reader, player display, PIN pad, funds acceptors and GSA controller.

Reliability: the GMCC has a reliability of an average of 60,000 hours mean time between failures (MTBF).

<u>Security:</u> The GSA microprocessor controller card is housed inside the EGM machine cabinet and is thereby not accessible to external interference by players or persons without access to the locked EGM cabinet.

<u>Active 2</u> sees GSA applications directly interfaced to the EGM applications and using the processors inbuilt into the EGM along with the EGMs other fitted peripherals (pin pad, coin /note acceptords, video display, etc).

4. Coin, Note and Cashless acceptors

These devices are part of the EGM, where fitted, and are protected on the EGM side by its one way communication protocol from the Data Port. The EGM is otherwise isolated from external connections. In the event that a particular EGM machine contains no suitable coin or note or cashless acceptor and they are required in the EGM machine as an optional funds input suitable acceptors with certification for inclusion in EGM machines are available from Microsystems Controls Pty Ltd (the Microcoin QL) or other manufacturers. The interaction between the GMCC and the acceptors is controlled in a one way mode from the GMCC to the acceptors. The GMCC cannot be influenced from the acceptor other than its sensing of the number of coins or notes inserted or credit to be taken from the cashless acceptor. None of this "inserted" funds information is used for other than computation of the amount of money the player has indicated they are prepared to spend by having inserted it, it can in no way facilitate a fraud of allowing operation of the EGM other than in accordance with the EGM machines parameters. The acceptors are connected to both the EGM and the GMCC however, there is no way the EGM can influence the GMCC or vice versa other than in accordance with the specified and expected operational manner. Once an acceptor is no longer inhibited by the GMCC and whilst no pre-commitment limit has been reached the acceptance of inserted funds is an EGM function. The only influence GSA exerts over the coin or note or cashless acceptors is to inhibit their function resulting in rejection of the funds from the acceptor. GSA cannot under any circumstances cause a credit or debit of funds to an EGM machine.

In most cases the acceptors are already fitted to the EGM machines and meet the reliability and security requirements envisaged for these machines. GSA does not modify adversely any of these reliability or security measures.

<u>Reliability:</u> is as per certified EGM machine statutory requirements. <u>Security:</u> is as per certified EGM machine statutory requirements.

5. <u>Local area network connection to GSA site controller:</u>

Category 6 TCP/IP cabling is used or secure WEP wireless connections can be used. The protocol between the GMCC or under Active 2 the EGM site controller and the GSA site controller is a secure messaging challenge response encrypted one, not subject to eavesdropping or remote decryption. Any attempt to breach this security would be obvious and require exposing a cable, any such activity would be in plain view of the public.

6. Player Message Display:

This display forms part of the sandwich board along with the manual insert card reader and PIN pad entry device. The message display consists of 2 or 3 lines of 20 characters of either 10mm or 5-6mm height which are backlit. In other then <u>Active 2</u> the display is powered from the GMCC and communicates with the GMCC. In *Active 2* the display is provided by the manufacturer and the EGM *talks* to it under direct instruction from the GSA application. The display shows targeted player messages when required. Depending on the length of the message it may be cycled.

Reliability:

MTBF 30,000 hours.

Security:

The display is connected only to the GMCC and has no connection to the EGM machine, it has no input capability and hence cannot be viewed as a security risk area.

Reliability and security of system software

GSA is written in a compiled version of PHP and Java and resides on a GSA Host that is protected using hardware (SPI) and software firewalls running on a LINUX operating system.

Similar architecture software systems developed by AMC Convergent IT and in commercial use have proven exceptionally reliable with 100% availability in terms of the application software, the operating system and hardware involved.

These systems operate exactly in the manner GSA does using broadband Internet connections for online enquiries, authorisations and database lookup and updates in a real time environment over a secure https URL.

The Meat and Livestock Australia (MLA) system has been installed and commercially operational for over 2 years during which there has not been any down time associated with the application or hosted components and a 99.99% availability of the Internet connection. This portal has processed millions of transactions.

A second example is AMCCIT provides the Host Portal to Lucky buys loyalty system. The Lucky buys portal has some 500 retailers at which customers access the AMCCIT portal for redemption and accrual of loyalty points in an online real time sense 7 days a week and 24 hours a day. There are in excess of 750,000 such Lucky buys cards in active use and the database has in excess of 10,000,000 active transactions. The Lucky buy Portal uses the same software and architecture as is implemented in the GSA Host with some obvious differences. The Lucky buy portal is used in RSL Clubs, automotive spare parts retailers, supermarkets (IGA and Foodworks), specialty shops, butchers, green grocers, bread shops and others.

Currently, AMC Convegent IT portal Internet based architectures are supporting in excess of 500 sites and processing databases with in excess of 50 million transactions.

This means the application and its architecture is proven!

Reliability:

Reliability of the GSA Host and the MLA Host and other hosts operated by AMC Convergent IT is brought to 100% even with the minor Internet exposure by a host replication in a separate physical facility philosophy. The replicated Host is kept up to exactly the same point as the live Host. In the event of the main Host failing or becoming unavailable as a result of a domain name server (DNS) failure the GSA site controller automatically switches across to the replication host. The main Host and replication Host use different internet service providers (one Telstra and one Optus). The main Host is located in Wheelers Hill and the replication Host is located in Melbourne – significant physical separation to ensure any act of God effect is highly unlikely to render both Hosts unavailable simultaneously.

Load balancing hardware, operating system software and Internet bandwidth (pipe size) of the GSA Host ensures rapid servicing of site requests and updating of databases. Responses to authorisation requests and pre-commitment monitoring is expected to be of the order of 1 second per event. Internet connections are symmetrical (SSSL) and 5 MPBS.

The online transaction database is Oracle and this database has a high level of integrity and backup and recovery tools.

Security:

Internet hosted portal applications developed on the same software platform as GSA have not had a security breach in the nearly three years they have been implemented and published. This applies to the MLA butcher system Portal in which different butchers have access to their own information and not the other butchers and MLA who has access to a restricted amount of the butcher information.

Access to the system is restricted through the following means:

- a) The GSA host is a secure "https" site.
- b) User identity and password access with privilege restrictions is used. This is at a venue, corporation, governing body and player level.
- c) Passwords are md5 128 bit encryption.

- d) Access is restricted to activity authorised by privileges for the venue, corporation, governing body and player levels controlled. The access level and privileges are determined by the login type.
- e) Sessions that are initiated and are not logged out by the user are automatically timed out on a session basis.
- f) The Oracle database is on a separate physical device to the application software preventing unauthorized access by external users or hackers or spoofing. Further protection includes password access and encryption.
- g) Firewalls of both SPI packets hardware type and software types are used throughout the network preventing invasion by worms, Trojans or viruses or any unauthorized probing. Any unauthorized TCP/IP address attempting to probe the site is tracked.
- h) All activities of logged in users, including players using the self maintenance facility are recorded and tracked. All activities are date and time stamped as well as with the TCP/IP address.
- i) Incoming and out going EGM machine messages use secure authorised direct database access. It is not possible for a person from the site to gain access to venue EGM equipment – the pathways do not exist.

Stage of Development of the Software:

GSA is a largely developed application (90%) performing all the tasks indicated in this and other documentation previously provided. This applies to card issuance, authorisation, pre-commitments, modelling, identification of "at risk" and "problem gamblers", triggering, blocking (exclusions), activity statements and support for cash and cashless playing.

Complete components:

- 1. Card registration venue or GSA point based.
- 2. Pre-commitment setting or updating by the player at either the venue, kiosk, by mail or by the player themselves accessing the Internet Self Maintenance. This includes automatic generation of an email, SMS or mail out to a player of any changes, including exclusions, they or an authorized authority may make to their profile. Clearly, players need to provide a contact method to be able to do this.

- 3. Card blocking by player (via Self Maintenance), or venue or authorized authority.
- 4. Card unblocking by venue or authorized authority.
- 5. Authorisation request from the manual insert card reader to the GSA Host.
- 6. Monitoring of all the pre-commitments and their enforcement in the active mode. This includes circuit breakers, spend, time, denomination limits, specific exclusion dates; in fact all the pre-commitment forms cited on a session, day, week, month and year basis have been implemented.
- 7. Inhibiting and enabling the coin / note acceptors has been implemented.
- 8. Player self access to their activity statement over the web is complete.
- Player ability to monitor and deposit money to a cashless account on the GSA Host is completed.
- A player selecting cashless play results in continued inhibition of coin and note acceptors to prevent such players using cash to play, this is complete.
- 11. Player Internet Self Maintenance is complete.
- 12. Processing of the Data Port information from the output in XML format under CMS (Tabaret) has been performed. AMCCIT has had a wealth of experience in interfacing Legacy system data files and formats to the newer software environments and architectures. It has undertaken interfacing extremely large and complex data flows from packages such as Oracle Financials, SAP, Retek and Merchandising systems that were put in the field some 15 years ago. Equally AMCCIT is adept at interfacing to the latest and more portable data formats (XML and the like). By way of example the Merchandising interfacing performed was for a Middle East client, a group of very large supermarkets and involved the daily processing of a million lines of data to and from the Legacy database. Consequently, interfacing to the old Legacy data stream environment in use in South Australia for the Monitoring System (E2) is not expected to challenge AMCCIT providing the version makes available the data needed continuously.

In the recent past AMCCIT has undertaken without assistance, from the original developers or vendors, interfacing to:

- i. TASKPOS for the RSL
- ii. OZPOS for IGA and Foodworks

- iii. The airport operations system at Kuala Lumpur International Airport.
- iv. SAP
- v. RETEK
- vi. H & L Australia hospitality and hotel POS/Loyalty
 Historically, AMCCIT has interfaced to systems, in a bidirectional sense
 using EBCDIC, ASCII, SQL, ORACLE, PARADOX, XML and many many
 more.

Not only have these interfaces involved making sense of the data in an otherwise incompatible system but also the transportation of the information from the Legacy platform to the AMCCIT platform.

AMCCIT has the experience, skills and staff to undertake interfacing to virtually any Legacy system and firmly believes the Monitoring System in use by the various State Gaming and Gambling Authorities would be a simple task to perform.

The transportation tools are already in place for both UNIX (AIX) and Windows based platforms.

The AMCCIT experience is so wide it can predictably indicate the time required to develop and test the interface and transportation from and to a Legacy system is no more than 21 days.

- 13. Venue maintenance has been completed.
- 14. Machine set up maintenance including location within the venue of a machine has been completed.
- 15. Modelling applications to detect "at risk" and "problem gambler" behaviour have been completed and initial parameters established.
- 16. Triggering applications completed.
- 17. Replacement of lost, destroyed and stolen cards is complete.
- 18. Ability to send player transactions to their selected loyalty scheme provider(s) is ready for the specific interfacing to the particular loyalty scheme involved. A player may be a member of four (4) loyalty schemes simultaneously. The time required to complete the specifics for all 4 loyalty schemes would take 40 days.
- 19. The forwarding of *targeted messages* to a specific EGM machine via the GSA local area network (TCP/IP based) is completed.

- 20. Reporting on playing activity at State level, Venue level and individual player level for spend, money in, pay out, session details and other aspects is completed. GSA reporting in this transaction session area is so complete it is possible to monitor the payback performance of a venue, corporate and State level.
- 21. Scalability testing to support an Australia wide implementation have been conducted and the results indicate the GSA architecture is capable of supporting such an implementation. This means the GSA architecture is able to support the 12,000 EGM machines in the 600 venues in South Australia.

Areas of GSA requiring development and testing are:

- 1. Interfacing with the IGA South Australia monitoring system.
- 2. Pilot testing of the hardware components inside an EGM in the field.
- 3. Direct interfacing to the Counselling providers to alert them to an "at risk" or "problem gambler" requiring assistance.
- 4. Housekeeping scenarios.
- Policy determinations as to hours prior to a relaxation of limits becoming enabled, removal of exclusions and confirmation as to whether tightening of limits is to be immediately enabled.
- Interfacing from the GSA Portal Host to the various loyalty based providers to facilitate the use of the GSA card as the loyalty card for all the relevant industry players.

Reference Sites:

Each of the reference sites has been selected because the architecture is the same or very similar to the GSA architecture proposed:

- a) RSL Epping
- b) RSL Upwey
- c) IGA and FoodWorks
- d) Sultan Centre Kuwait 9 large scale supermarkets each with approximately 30 POS online devices.
- e) Lucky buys has 500 sites with a database of some 750,000 active card holders generating some 10,000,000 transactions per annum. Performing both online redemption and point accrual in a loyalty system environment.

- f) Meat and Livestock Australia industry level reporting and supporting online real time transaction processing of butcher members throughout Australia. This includes online loyalty card recognition and online central portal inquiry within transaction and real time online updating of the Portal Host at the conclusion of each transaction.
- g) H & L Australia a South Australian software company specialising in the hotel, club and leisure markets with some 2,500 clients have interfaced their POS and back office systems to the Internet based online Loyalty AMCCIT Portal systems due to its power, scalability and availability.

Deployment of System:

1. GSA hardware installation and commissioning 12,000 machines in venues:

Deployment teams would be trained to install the hardware components within the EGM machines at the venues. Given the EGM is a "secure" device whose certification and statutory rules requires suitably licenced persons open and close these devices the installers would need to work on an EGM under the supervision of a suitably qualified and licenced venue person or become licenced.

Estimates of the time taken to install, test and commission the inclusion of the GSA components in an EGM are 2 hours per machine.

For South Australia for example AMCCIT would propose 10 teams of 3 persons each be recruited as contractors to be trained in this task.

- The expectation would be for between 400 and 500 EGM machines to be installed with the GSA components and be connected to the GSA Portal Host per week. Consequently, the deployment at the EGM level of GSA for 12,000 EGM machines is expected to take between 24 and 30 weeks from commencement.
- Of these 30 installation contractors approximately 10 would be retained on a contractual basis for hardware support and maintenance purposes.

An Australia wide rollout would require additional teams and resources and would take some 18-24 months to complete.

2. GSA software development completion outstanding components:

All of the components identified in *Areas of GSA requiring development and testing* would be completed, including thorough testing, within 3 months from commencement. This includes the interfacing to the *Monitoring System* and Loyalty Schemes in use in South Australia. This activity runs in parallel with the other deployment tasks.

3. GSA hardware components:

With the exception of the GSA Microprocessor controller card (GMCC) all the required hardware components are readily available. GMCC has been developed and awaits manufacture in quantity.

The production of 12,000 plus GMCC can be expected to require 3 months to achieve allowing for tooling and manufacturing times.

4. <u>Card issuance</u>

The GSA portal host and replication hosts are available now; the process of issuing cards to players can be expected to take a considerable period of time. The GSA card holds no information other than the card number and hence there is no reason the process of card issuance to the playing public could not commence 1-2 months <u>prior</u> to the commencement of the venue installation process. This would ensure the members of the playing public were not inconvenienced by the implementation of GSA. Card issuance should be accompanied by an public education program informing the public concerned of the changes and benefits GSA brings.

This time frame facilitates the playing public consideration and setting of their pre-commitment limits.

Card issuance is achieved be through venues, GSA manned kiosk points, mail with personal pick up or other appropriate and secure methods.

The GSA philosophy and architecture facilitates the parallel implementation of all the aspects of GSA with one exception if <u>Active 1</u> mode is used the installation process cannot occur prior to the availability in sufficient numbers of the GMCC card.

Venues can be brought online progressively as GSA is installed.

The <u>elapsed</u> time frame from commencement to complete installation in all of the venues within South Australia for 12,000 EGM machines is between 10 and 12 months from initiation. During this period public awareness, instructive advertising material and public relations and within venue "training" can and should be undertaken educating the public player as to the benefits provided by GSA and the means in which it is capable of providing not merely harm minimization but offering harm avoidance.

Interoperability of the System between venues:

Authorisation, play, continual monitoring of pre-commitment limits and exclusions are processed from each individual EGM machine within a venue through a GSA site controller (for offline capability) to the Internet (using ADSL) and thence to the GSA Host and likewise there is a *return* path to the EGM within the venue in which the card is inserted.

Hence each venue and in fact each EGM machine is connected to the GSA Host via the Internet, this ensures that players moving from both one machine within the same venue or to different venues receive continual harm avoidance and pre-commitment monitoring.

The information relevant to activity within a venue is held on the GSA Portal Host and each suitably authorised venue can access information relevant to a specific card for a specific authorised purpose or information relating to their venue or with suitable privileges their group of venues. There is no direct link between any two venues nor is one required for GSA activities to be fully functional.

GSA provides the ability for players to replace a whole group of loyalty cards with just one. GSA can output the information, if authorised by the player, relevant to the loyalty scheme they are both a member of and is applicable to the venue in which they are playing. This information can be passed on either an online or batch update process depending on the capability of the Loyalty Scheme concerned.

Interfacing to Gaming Monitoring System:

GSA utilises information output from the Data Port to monitor and obtain information on a player's activity including pre-commitments on the EGM machines.

The information is used for <u>all</u> forms of GSA, both *active* and *passive*. In the *passive* mode this information, if available, is used to detect no card is inserted and that precommitments have been reached or exceeded and then to alert venue staff. In view of the importance of the information provided by the monitoring system to providing an effective and efficient harm minimisation and harm avoidance mechanism it is AMCCIT's intention to develop the interfaces to not only the IGC monitoring system data port output but <u>all</u> implemented monitoring systems, where possible, and GSA to gain the best advantage and interactions from the information available from them. GSA is capable of *replacing the existing monitoring systems*. Thereby ensuring Regulatory compliance and globally implementing GSA. Interfaces to existing monitoring systems can be rapidly and readily implemented using XML architecture it requires the current owners to co-operate, this is not seen as a significant issue.

Preliminary estimates based upon experience and having performed similar tasks in the past are the interfacing to each of the Monitoring Systems will take no longer than 21 days from commencement of the task for each including bidirectional controls in the *Active 2* mode. AMCCIT has a vast experience in interfacing to Legacy systems and communications and anticipates no difficulty in completing the Monitoring System interfaces.

AMCCIT notes the comment in the *Terms of Reference* pertaining to the Monitoring System in section 4.2.3 that IGC is considering options for support of the monitoring system beyond 2008. If IGC is considering outsourcing the support arrangements for the monitoring system AMCCIT would be interested in pursuing the possibility of providing this Monitoring support role to the States with GSA providing the Monitoring functionality which it is capable of doing. AMCCIT is a software development and support organisation with considerable large scale client and industry experience.

E.g. Airport retail management system at the Kuala Lumpur International Airport (100 plus retailers and the Airport Operations Centre), the MLA industry red meat portal and the connected butchers and companies, Sultan Centre in Kuwait and Oman with 10 very large supermarkets trading 24/7. AMCCIT provides hosting and loyalty services to over 100 hotels and clubs in Victoria, South Australia, Western Australia, New South Wales and Queensland

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Pending in other Jurisdictions

4.3.4 Other considerations

- (1) Implications: Licensees, employees and non-gamblers
 - GSA will relieve licensees and their employees their current duty to identify problem gamblers and also the very difficult task of identifying and evicting excluded gamblers.
 - We also consider, that once effective systems such as GSA are in place, venue staff will perceive players will enjoy a legitimate form of gambling without being at risk of potential or actual harm. Despite the benefits of employment and job satisfaction from positive contact with the public, undoubtedly many venue staff are concerned about the damage machine gambling causes some patrons. In reducing these concerns and alleviating staff of their difficulty policing duties, GSA has the potential to increase morale and job satisfaction. The benefits that flow to licensees are obvious.
 - Non-gambling patrons are more likely to enjoy their stay at venues
 when they also perceive the reduced actual and potential harm from
 this form of gambling to those they see around them.
 - We expect a greater patronage of both the gambling and nongambling facilities of venues, as the public perception of the safety of gaming machine gambling improves under a GSA environment.
 - GSA prevents individuals playing more than one machine at a time.
 This relieves licensees and employees of this difficult responsibility.
 - GSA can facilitate and subsume all loyalty schemes under one card.
 Convenience to players, results in a benefit to venues.

(2) Implications: Recreational gamblers

- With the general acceptance and use of many card types and functions in our community it is unlikely that a gambling card would not become similarly accepted over a relatively short period of time.
- Marketing of the obvious benefits of the GSA card will overcome any initial resistance.

- Players may gamble with the knowledge and security, and be assured that they will spend no more in time and money that they had intended.
- For the first time, through the availability of activity statements, players will know exactly how they spent their time and money.
- The availability of gambling activity statements enable players to more effectively budget for their gambling.
- Players can gamble with confidence, in the knowledge that should their gambling became problematic, GSA will identify them quickly and direct appropriate and timely support to them.
- Linking the GSA card to existing and emerging loyalty schemes and alleviating the need for players to carry several loyalty cards, provides further marketing opportunities.
- Any argument that the physical use of a card per se, would not be accepted, flies in the face of prevailing evidence. There are significant numbers of commercial loyalty schemes, which require the insertion of a card into gaming machines. There are also many thousands of gamblers who already use such cards. The use of the card may in fact add enjoyment to the gambling activity. Certain gamblers, who are rather superstitious in nature, may evolve ritualistic actions in the use of the card designed to improve their luck.
- The application process for a GSA card takes approximately 4 minutes depending on the number of pre-commitment limits set. The application process can be partially completed at home, via the web portal, email, Post or in person. Final card issuance necessitates the applicant being physically present at a venue or other authorized card issuance centre for 100-point identification check or other accepted identification means, i.e. photographic driver's licence. Provided a new player has sufficient identification on hand, they can begin playing within minutes of entering a venue.
- (3) Left cards, lost cards, tourist visitors, and card fraud

Left cards

 Cards left in machines without associated gambling activity are blocked after a specific period of time (configurable), and require input of PIN to reactivate. After a further specified period of time, venue staff are alerted and messaged to remove and take possession of card. Once any third party takes possession of a card, a claiming owner must undergo a verification process (md5).

Lost cards

- Lost cards, once reported are immediately blocked and not reactivated until returned to their rightful owner, upon owner identification (md5). Prior to being reported lost, the card cannot be used without its associated PIN, known only to the rightful owner. If permanently lost, a new card is issued to the owner upon proper identification. As no information, other than card number is stored on the card, all previous card history and information is re-associated to the new card from the central database and no information is lost.
- As no information, other than card number, is stored on the card, all
 information associated with that card is secure. Security of this
 information has been previously described in a preceding section.
- Without the PIN associated with the card, known only by the rightful owner, a lost card is useless to any other user.

Card fraud

- Fraud potentiality is partially a function of the threats and opportunities
 inherent in the system proposed. When there is less threat involved in the
 use of a gambling card by a gambler, there is little motivation to obtain
 and use a card fraudulently obtained.
- Given 100 point identification prevents supply of fraudulent cards, traders in cards would not likely exist.
- If the user voluntarily sets pre-commitment limits, rather than limits being set arbitrarily, there is less threat from the use of a card to limit an individual's gambling and no incentive to acquire another card.
- Voluntary overrides of pre-commitments set by players, is a configurable option within the current GSA software. Whether voluntary overrides are permitted is a decision by those who determine the final rules of engagement.
- Given a mandating authority allows voluntary setting of pre-commitment limits and voluntary overrides of those limits, there is less likelihood a

- gambler will be feel thwarted by a gambling card and have a motivation at that moment to acquire a card fraudulently.
- If relaxation of limits is mandated as only allowed after a time delay or prevented, conceivably, a desperate gambler having reached a limit, has an incentive to obtain a fraudulent card in order to continue gambling.

Card fraud and excluded gamblers

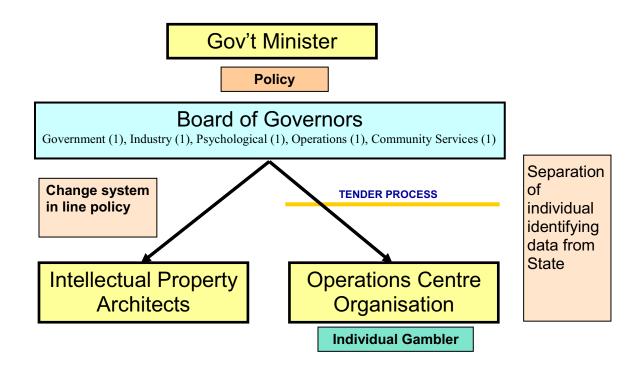
- Venue barred or court excluded gamblers have a stronger incentive to obtain fraudulent cards, but their numbers are low.
- Given the demand for fraudulent cards in low and it is extremely difficult
 for a corrupt individual to obtain a supply of cards, it is unlikely there is a
 throng of scalpers outside venues waiting for the limited trading
 opportunity presented above.
- Without demand for cards and without ready supply, card fraud is unlikely.

(4) Tourist visitors

- Upon presentation of suitable proof of tourist or visitor status, intending players can be provided with a temporary card.
- Tourist visitors could also avail themselves of the harm minimization and prevention facilities of the GSA system, by setting their own precommitments. Given the normal card application takes less than 4 minutes, a cut down application process for visitors will enable faster visitor access to gambling machines.

(5) Centralized Management

Central management could be achieved in the suggest structure presented during the Open Day and is show below.



(6) Other considerations

Identification of at risk and problem gamblers

- GSA identifies "at risk" and "problem gamblers" to whom support services
 can be directed. Support can be directed to identified individuals via SMS,
 email, Postal address or at the venue itself. The problematic aspects of a
 player's actual gambling behaviour, and the triggered psychological,
 psychiatric and demographic criteria, can be presented to identified
 individuals. These same individuals can be offered counselling support.
- The GSA pre-commitment facility, coupled with activity statements of gambling behaviour of individual gamblers can be used by treatment providers to counsel and support, and devise recovery programmes for at risk and problem gamblers
- GSA has a powerful population database to enable research into gambling behaviour. It provides objective information to form the basis of quality decision-making and evaluation of global and individual intervention strategies.

Biometric and other identification means

GSA is able to incorporate biometric and other identification systems in place
of cards. Given the already high level of security, reliability, low cost and
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acceptability of cards, one could question the need to go to biometric or other identification systems. It is likely there would be greater player resistance to facial recognition, iris scans, or other biometric systems. These identification systems may have a more appropriate application in high-level security buildings than in a gambling venue. Incorporating biometric identification as part of a universal harm minimization or prevention system may well prove too hard to sell to the gambling public.

• One application of biometric identification, mooted at the open day of presentations, had patrons being identified prior to entering the gaming room. Once within the gaming room, gambling activity could not be associated with any individual player and no pre-commitment or other functionality is possible. Other than for the purposes of exclusion, biometric identification at entry into the gaming room appears limited. The alternative is for biometric scanners to be installed at, or in each gaming machine. These would require continuous scanning to ensure that an identified player was the same individual continuing to play on that specific machine. To be acceptable and practical, scanning should not require active participation on the part of the player. It is unlikely players would accept submitting themselves to a biometric scan at each spin.

Sustainability

• Implementation of GSA, reduces actual and potential harm and identifies "at risk" and problem gamblers. Machine based gambling becomes a normal and safer industry enabling responsible marketing of a legitimate activity which in turn, results in a revenue shift from problem gamblers to non-problem gamblers. This revenue shift then characterises a mature industry, which is ethically, legally and economically sustainable. AMC has available a financial model which demonstrates such a revenue shift, and increases in total revenues over a 4 year timeframe following the introduction of GSA.

FUNDING AND COSTS

Gambler Subtle Assist (GSA) comprises several components, hardware and software, to produce the holistic player pre-commitment and identification and modeling of players. GSA is a thoroughly researched, developed and combined technology and social solution to the gambling dilemma facing society. It has evolved over the last four years from concept to existing and from needing machine manufacturer cooperation to being capable of being independent from them.

The first strength of GSA is its ability to <u>prevent</u> harm by virtue of its psychological and psychiatric based identification and modeling and reach the afflicted players whether they have chosen to be anonymous or not.

A second strength is the different *modes* GSA is available in, two <u>active</u> and one <u>passive</u> modes. Importantly, one of the active modes, Active 1, does not rely upon firmware changes being made to, or interfering with the EGM machine and the manner in which the player interacts with it other than to require the player to insert a GSA card. This fact alone removes manufacturer dependency on the implementation of GSA – the manufacturer does not need to do a thing.

A third strength is GSA offers harm avoidance in addition to harm minimization. Providing a resource to protect players and their dependents.

A fourth strength is GSA is based upon currently available technology.

A fifth strength is GSA component parts have been proven. The active 1 mode has been proven using a coin acceptor and an EGM machine emulator. The active 2 mode requires software change at EGM only which is readily doable. These tests and simulations have demonstrated the pre-commitment strategies supported by GSA are all available with no requirement for changes in the EGM or interference with its operations and without adding burden to the venue staff needing them to be involved in policing harm avoidance and minimization in relation to EGM players.

A sixth strength is GSA facility for the player to have access to their information and be informed on exactly what they do and how much time and money they spend.

HARDWARE COMPONENT

Active 1 GSA – through inhibition of the coin or note or cashless acceptors in the EGM machine controls whether funds are allowed to flow into the EGM machine. Without funds the EGM machine will not function. The inhibition or enablement of the coin or note or cashless acceptors in the EGM machine permits GSA to directly enforce set player pre-commitments (refer PRECOMMITMENTS in this document) and can by denying the player the ability to deposit funds to the EGM prevent further play until the pre-commitment limit is not longer applicable. The current monitoring system output through the Data Port is used by GSA to collect information on the player activity. These features are controlled by hardware and software that has been outlined in more detail in other areas of this document.

Active 2 GSA – the preferred option involves the modification by the manufacturers of the EGM firmware to require the presence of the GSA card and to provide the inhibit or enabling of play through a direct interaction between the EGM firmware and the GSA applications, thereby enforcing player pre-commitments, enabling targeted messaging and facilitating all of GSA's functions. This method requires less hardware than Active 1 as most of the required hardware is already in the EGM machine, except perhaps the card reader and the PIN pad. An additional complication is the number of manufacturers who would need to make firmware changes, re-certify the EGM machines, the cost and the time to do these changes. These complications are not severe. Each manufacturer would co-operate if the alternative was they could not be in the market. This is the best option.

Passive GSA – this mode assumes there is no control by GSA over the coin or note or cashless acceptors and consequently GSA cannot actively stop a player reaching or exceeding a pre-commitment limit. Rather GSA can send messages to the venue operators on a terminal that there is a player on such and such an EGM machine who is excluded or has reached a pre-commitment limit or is playing without a GSA card inserted. The venue staff, or other authorized staff, then need to interact or intervene with the player to bring effect to the pre-commitment. The hardware requirements in this mode do not significantly differ from the Active 1 GSA scenario but coin, note or cashless acceptor inhibition is not required. However, the microprocessor controller card and player display and PIN pad remain requirements.

In <u>all</u> modes the identification and modeling aspects of GSA remain active and effective.

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Coin, note and cashless acceptors

Machines already fitted with these acceptors that can react to an electronic inhibit signal do not need to be replaced and can be used. There is no complex interfacing between GSA and the acceptors, simply the raising or lowering, under circumstances controlled by the GSA microprocessor controller card (GMCC), of a voltage signal to the acceptor. For the counting of the funds inserted in a stream and rejection of the funds exceeding a pre-commitment limit the acceptor needs to be able to send a pulse or signal to the GMCC card. It is expected most of the acceptors in use in the current EGM machines installed would comply with at least the inhibit/enable requirement. Should it prove not to be the case pricing of a coin acceptor that is capable of both functions and is approved for use with the EGM machines in Australia and elsewhere and has been interfaced to various manufacturers EGM machines has been provided.

Not unexpectedly the preferred *Active 2* implementation is the cheapest with the only unknown being the cost of altering the firmware – although one can expect this cost to be not unreasonably zero; a cost of doing business for the manufacturers.

Hardware pricing is affected by the implemented mode of GSA and the following table attempts to document the various cases. In general terms the pricing contained here would be at the upper end in a competitive tender process.

The pricing has been based upon a notional 12,000 EGM machines and excludes GST.

Active 1 (hardware):

EGM contains suitable acceptors

EGM does not contain suitable acceptors

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

Active 2 (hardware):

Passive (hardware):

This mode reports to the venue operator or other authorized person about EGM machine player activity – no card, excluded, or pre-commitment limit reach/breached; there is no active machine level intervention thus acceptor interfaces are not required. Player display is controlled by the GMCC card. No interfacing to EGM machine is required for this mode.

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

Table of Hardware Prices 12,000 EGM machines

SOFTWARE COMPONENTS

The "heart" of GSA is the software applications for:

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

The subscription fee (per card or per EGM machine) provides the following:

The likely per card per player per annum fee

EGM levy fee

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

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(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

ALTERNATIVE FUNDING OPTIONS

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

PROJECT IMPLEMENTATION MANAGEMENT

(See confidential Part document – separate cover AMCCIT PCS GSA 150305_CONFIDENTIAL PAGES.doc)

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ANNEXURE 1

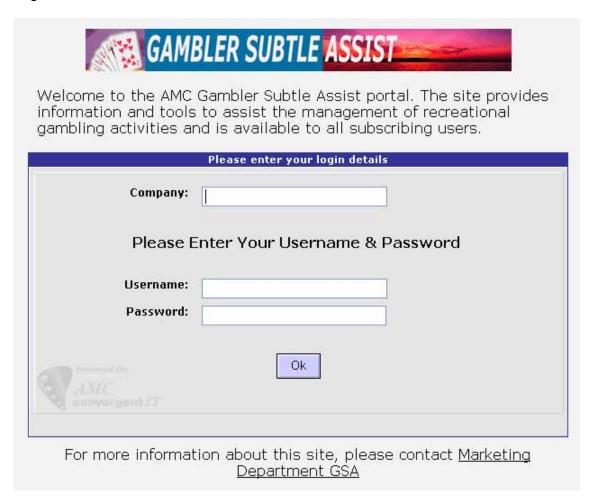
Gambler Subtle Assist

Application Overview

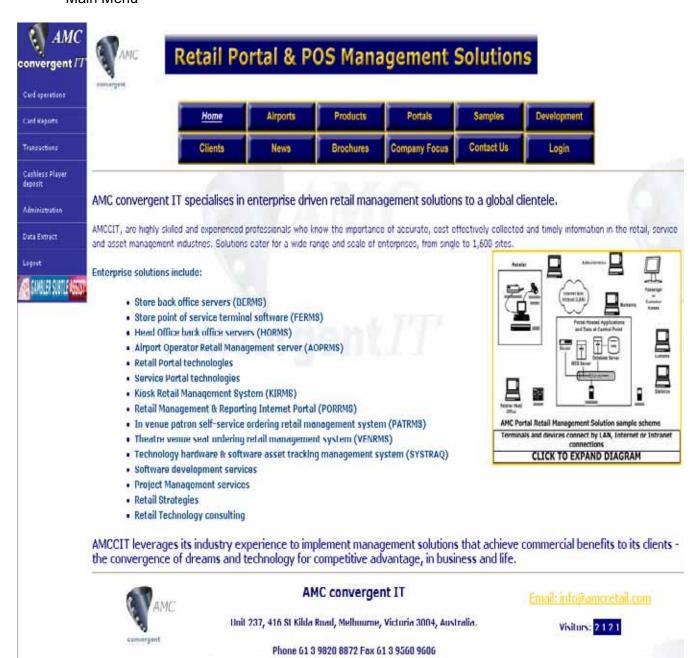
Gambler Subtle Assist (GSA) is an application that exists and is comprised of field tested modules that have been in use in commercial real time similar applications for several years. The development environment is a rapid development one readily changeable to meet the changing Statutory or Player needs.

The attached screen dumps represent forms and reports from the GSA application in a real time live environment.

Login screen



Main Menu



The menu options shown and accessible to a particular "user" is determined by the privileges of their specific login.

The statutory body's or the venue owing company's web page is shown following the user login.

An enlarged main menu is shown below:



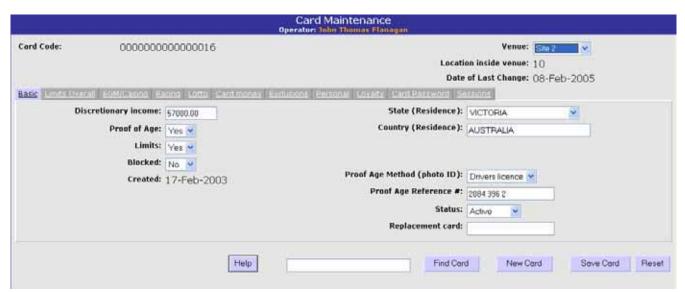
From this main menu the Statutory body, or Venue or venue owning company can perform various functions that their privileges allow them to do.

Card or Player information:



The choices available are shown.

Player card information



- 1. Discretionary income is optional.
- 2. State and Country of residence is compulsory.
- 3. Proof of Age and the 100 point ID method is compulsory, the 100 point method is held in non-human readable form in the database.

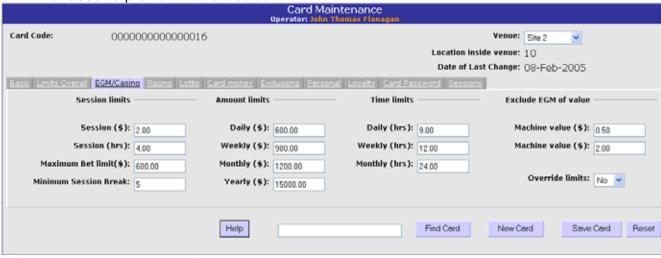
4. Limits (pre-commitments) can be set to compulsory.



Players may specify over all spend pre-commitment limits and indicate if limits apply to <u>all</u> forms gambling. GSA is written to apply to EGM/Casino, racing and lotto gambling monitoring.

GSA is configurable to support monitoring of all or each of or a combination of gambling on EGM/casino, racing or lotto.

EGM/Casino pre-commitment screen



EGM limits (pre-commitments) are spend and time based

Racing pre-commitment screen



Lotto pre-commitment screen



Cashless playing option

	y y y y		Card Mainte					
Card Code:	00000000000000016				Venue:	Site 2	×	
					Location inside venue:	10		
					Date of Last Change:	08-Feb-2	2005	
Basic Limits Cont	M EGM/Carino Smins Lotte S	ard money	Endusions (Entronal i	Javator Gerd Passo	end Semilens			
	Play money on card only:	Yes w			Bala	nce remain	ing \$ 620.00	
	Last deposited \$	500.00						
	Maximum card balance \$	2500.00						
	Date of deposit:	2005-02-0	8 01:31:07					
		Help			Find Card New C	ard	Save Card	Reset

If a player selects to play using "cashless" methods then play on any EGM using coins or notes is inhibited by GSA. *Cashless* play can <u>only</u> occur when a card account is in credit.

Exclusions

ard Code:	0000000000000016			Venue:	Site 2	•
				Location inside venue:	10	
				Date of Last Change:	08-Feb-	2005
atic Limits Overal	EGMACasing Bases Lutto Cardinies	Exclusions Benefit Foreign	You Shired Balls	Word Sessions		
		Exclude on pension/pay day:	No 🕶			
		Last Pay Day date:	0000-00-00			
	Pe	nsion/Pay day cycle(weeks):	0			
		Date limits modified: 2	2005-02-0	8 22:18:00		
	<u> 1</u>	72				
	Help			Find Card New C	ard	Save Card Re

Players can elect to exclude themselves from playing or gambling on EGM/casino and other forms of gambling, if configured, on days selected by themselves such as paydays or pension days and the like.

Personal

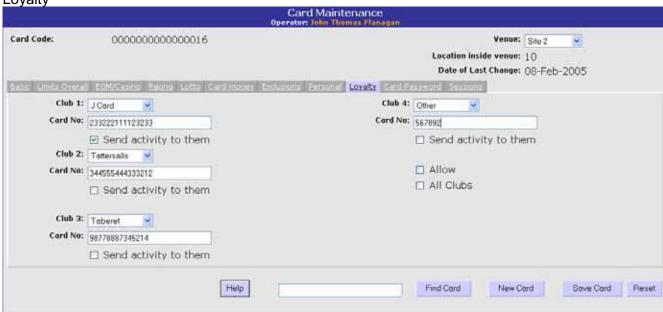
ard Code:	0000000000000016		Venu	et Site 2	w
			Location inside venu	e: 10	
			Date of Last Chang	e: 08-Feb	-2005
anic Unita Overal Edi	MCasino Basino Listro Gard	Interes Reduciona Personal Loyalty Catel	Password Sessions		
Firstname:	JOHN	Email:	acs_john@yahoo.com		ii.
Middle Initial:	T	Mobile phone:	0405224180		
Surname:	FLANAGAN	Telephone:	03		
Address:	UNIT 237	Extension:	12345		
±	416 ST KILDA ROAD				
City:	MELBOURNE				
Postcode(zip):	3004				

Depending on the statutory body's rules this information is optional for players to provide. The email address or phone numbers are used, where provided to advise & contact the player in relation to profile changes or their identification of "at risk" or "problem gambler".

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Loyalty



GSA provides the ability for a player to specify loyalty schemes of which they are members and to whom they wish to have their playing activity updated to. Currently, a player may specify 4 clubs to be a member of, this can be readily increased. Players accrue loyalty transactions to the Club the venue is associated with if they are a member of that Club.

Password



This tab is where the player sets up their password. At the issuance of a GSA card a default – *random* password is allocated and advised to the player (in person in a sealed envelope or by automatic email). The player can then change the password using the *Internet Self Maintenance* application over the web.

Sessions



The *players sessions* over the current month are shown. Not the underline of the session date and time indicates the session details are available to be drilled down to. Longer periods of the player's gambling history can be viewed in other GSA options.

The results of a drill-down on a session is shown below:

Session				rerminal I	, Session	1: Site 1
Reference	Information	<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	<u>Net Movement</u>
/enue	Site 1	15:53:49	324	\$1.00		\$1.00
Terminal	1	15:53:50	325	\$1.00		\$1.00
Session	1	15:53:41	320			
Card #	0000000000000016	15:53:49	323	\$1.00		\$1.00
Date	2005-02-12	15:53:46	322	\$1.00		\$1.00
Start Time	00:35:03	15:53:43	321	\$1.00		\$1.00
End Time	00:35:18			\$5.00		\$5.00
Duration	0 Minutes					
Machine Denomination	\$0.20					
Funds Advanced	\$0.00					
Total Loss	\$5.00					
Denomination Warning	No					
Denomination Block	No					
Excluded Warning	No					
Excluded Block	No					
Amount Limit Warning	No					
Amount Limit Block	No					
Time Limit Warning	No					
Time Block	No					
Number Of Bets	5					
Number Of Wins	0					
Number Of Fund Updates	1					
Average Bet	\$1.00					
Average Win per Bet	\$0.00					
Average Win	\$0.00					

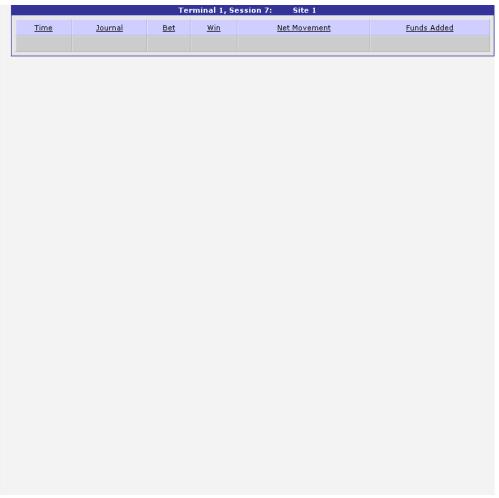
In this example the player did not reach any pre-commitment limit.

In this example a player whose GSA card is blocked attempted to use their card

Session I				Te	rminal 1,	S
Reference	Information	<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	
nue	Site 1					
erminal	1					
Session	9					
Card #	0000000000000101					
Date	2005-02-12					
Start Time	16:01:37					
End Time	16:01:37					
Ouration	0 Minutes					
Machine Denomination	\$1.00					
Funds Advanced	\$0.00					
Total Winnings	\$0.00					
Denomination Warning	No					
Denomination Block	No					
Excluded Warning	No					
Excluded Block	Yes					
Amount Limit Warning	No					
Amount Limit Block	No					
Time Limit Warning	No					
Time Block	No					
Number Of Bets	0					
Number Of Wins	0					
Number Of Fund Updates	0					
Average Bet	\$0.00					
Average Win per Bet	\$0.00					
Average Win	\$0.00					
Average Time to Bet	0.00 Seconds					

The player was not able to play because the card is blocked.





This player has elected to not play on \$0.50 machines and has been prevented from doing so by GSA.

Reference	Information
Venue	Site 1
Terminal	1
Session	2
Card #	00000000000000101
Date	2005-02-12
Start Time	00:19:45
End Time	00:34:52
Duration	15 Minutes
Machine Denomination	\$0.20
Funds Advanced	\$0.00
Total Loss	\$2.10
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	27
Number Of Wins	3
Number Of Fund Updates	3
Average Bet	\$1.08
Average Win per Bet	\$1.00
Average Win	\$9.00
Average Time to Bet	33.33 Seconds

		Terminal	1, Session 2:	Site 1	
<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	Net Movement	Funds Added
15:10:58	299	\$0.50		\$0,50	
15:11:04	300	\$2.00		\$2.00	
15:10:56	298	\$0.50	\$4.50	-\$4.00	
15:10:50	0				\$0.
15:10:16	296	\$1.00		\$1.00	
15:10:28	297	\$0.50		\$0.50	
15:11:12	301	\$2.00	\$18.00	-\$16.00	
15:11:18	302	\$2.00		\$2.00	
15:11:24	307	\$2.00		\$2.00	
15:11:25	308	\$2.00		\$2.00	
15:11:22	306	\$2.00		\$2.00	
15:11:21	305	\$2.00		\$2.00	
15:11:19	303	\$2.00		\$2,00	
15:11:20	304	\$2.00		\$2,00	
15:08:57	0				\$4.
15:10:14	295	\$1.00		\$1,00	
15:09:26	286	\$0.50		\$0,50	
15:09:28	287	\$0.50		\$0,50	
15:09:24	285	\$0.50		\$0.50	
15:09:23	284	\$0.50		\$0.50	
15:09:15	282	\$0.10		\$0.10	
15:09:22	283	\$0.50		\$0.50	
15:10:09	0				\$2.
15:09:31	288	\$0.50		\$0,50	
15:09:55	293	\$1.00		\$1.00	
15:09:57	294	\$1.00		\$1,00	
15:09:37	289	\$0.50	\$4.50	-\$4,00	
15:09:48	292	\$1.00		\$1.00	
15:09:42	291	\$0.50		\$0.50	
15:09:40	290	\$0.50		\$0.50	
		\$29.10	\$27.00	\$2.10	\$6.

This is the session history of a player who spent 15 minutes on a \$0.20 machine, made 27 bets, had 3 wins, had an average bet of \$1.08 and inserted \$6.50 eventually loosing \$2.10 over the session. The session started at 00:19 on the 12th February 2005 and ended at 00:34 on the same day.

The information block on the right hand side shows each spin of the EGM machine in this session. This information indicates the audit number, bet amount, amount won, net movement and the points at which funds were added to the EGM machine by the player (coin or cashless).

Reference	Information		
Venue	Site 1		
Terminal	1		
Session	1		
Card #	000000000000000101		
Date	2005-02-11		
Start Time	00:19:15		
End Time	00:19:35		
Duration	0 Minutes		
Machine Denomination	\$0.01		
Funds Advanced	\$0.00		
Total Loss	\$30.00		
Denomination Warning	No		
Denomination Block	No		
Excluded Warning	Yes		
Excluded Block	No		
Amount Limit Warning	Yes		
Amount Limit Block	No		
Time Limit Warning	No		
Time Block	No		
Number Of Bets	49		
Number Of Wins	4		
Number Of Fund Updates	0		
Average Bet	\$0.73		
Average Win per Bet	\$0.12		
Average Win	\$1.50		
Average Time to Bet	0.00 Seconds		

		Terminal	1, Session 1:	Site 1	
<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	<u>Net Movement</u>	Funds Added
00:20:40	148	\$0.10		\$0.10	
00:20:39	147	\$0.10		\$0.10	
00:20:40	149	\$0.10		\$0.10	
00:20:41	150	\$0.10		\$0.10	
00:20:42	151	\$0.10		\$0.10	
00:20:37	146	\$0.10	\$1.50	-\$1.40	
00:20:36	145	\$0.10	\$1.50	-\$1.40	
00:20:28	141	\$0.50		\$0.50	
00:20:29	142	\$0.10		\$0.10	
00:20:34	143	\$0.10	\$1.50	-\$1.40	
00:20:35	144	\$0.10	\$1.50	-\$1.40	
00:20:46	152	\$1.00		\$1.00	
00:20:51	153	\$2.00		\$2.00	
00:21:48	160	\$2.00		\$2.00	
00:21:48	161	\$2.00		\$2.00	
00:21:49	162	\$2.00		\$2.00	
00:21:57	163	\$0.10		\$0.10	
00:21:47	159	\$2.00		\$2.00	
00:21:47	158	\$2.00		\$2.00	
00:20:51	154	\$2.00		\$2.00	
00:20:52	155	\$2.00		\$2.00	
00:21:01	156	\$0.50		\$0.50	
00:21:10	157	\$0.10		\$0.10	
00:20:27	140	\$1.00		\$1.00	
00:20:26	139	\$1.00		\$1.00	
00:19:39	123	\$0.20		\$0.20	
00:19:38	122	\$0.20		\$0.20	
00:19:40	124	\$0.10		\$0.10	

In this example, the player reached a session amount limit and was sent a targeted message to that effect.

Card blocking



When a card is blocked, an email or SMS or letter is forwarded to the player where the contact details have been provided. Once a card is blocked it is immediately rendered invalid.

Re-activating a GSA card

	- 0	rd Re-Activation Request perator: Flanegas, John Admin
Card Code:	000000000000016	Venue: Size 2 Location in venue: 10 Date of Last Change: 13-Feb-2005
		Blocked: No 💌

When a card is re-activated, an email or SMS or letter is forwarded to the player where the contact details have been provided. Once a card is re-activated it is immediately rendered valid.

REPORTING



Reporting is by card, venue or consolidated. A venue login allows the venue to see only their data. A Statutory Body login allows the user to see the consolidated view.

Reports may be shown for the last 7 days, 7 weeks, 7 months, 7 years or compare the last 7 of each Monday or Tuesday or Wednesday, etc.



Here one sees the totals for Site 1 for the Week ending 13 Feb 2005 and 20 Feb 2005.

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The sessions for Site 1 between nominated hours is shown below:

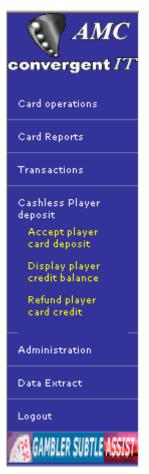
Sessions between 21:00:00 and 21:59:59 Site 1								
Terminal 🕶	Monday 14-Feb-2005	Tuesday 15-Feb-2005	Wednesday 16-Feb-2005	Thursday 17-Feb-2005	Friday 18-Feb-2005	Saturday 19-Feb-2005	Sunday 20-Feb-2005	Totali
1	\$0.00 1 \$0.00 2 \$0.00 1 \$0.70 2 \$10.00 2 \$35.00 4 \$0.00 4 \$10.00 1							\$55.76
Total:	\$55.70							\$55.70

Each underline is a journal for the EGM transaction in this Site 1 that can be drilled down on.

Reference	Information
Venue	Site 1
Terminal	1
Session	3
Card #	6016902010067516
Date	14-Feb-2005
Start Time	21:51:50
End Time	21:52:41
Duration	0 Minutes
Machine Denomination	\$0.50
Funds Advanced	\$50.00
Total Loss	\$10.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	1
Number Of Wins	0
Number Of Fund Updates	2
Average Bet	\$10.00
Average Win per Bet	\$0.00
Average Win	\$0.00
Average Time to Bet	0.00 Seconds

Terminal 1, Session 3: Site 1								
<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	<u>Net Movement</u>	<u>Funds Added</u>			
21:52:36	400	\$10.00		\$10.00				
21:52:15	399				\$40.00			
21:51:59	398				\$10.00			
		\$10.00		\$10.00	\$50.00			

Here one of the transactions has been drilled down to and note <u>all</u> the information including player card number is available for examination, reporting and monitoring.



CASHLESS PLAY

GSA supports cashless playing. The funds are not stored on the physical card, although smartcards can be used. The funds are deposited to the GSA card account and are held on the GSA Portal.

The funds are transferred to the "cashless" acceptor in the EGM and play according to any pre-commitment rules the player has put in place occurs.

The balance on the GSA card account is decremented by a transfer of the funds to the cashless acceptor or EGM.

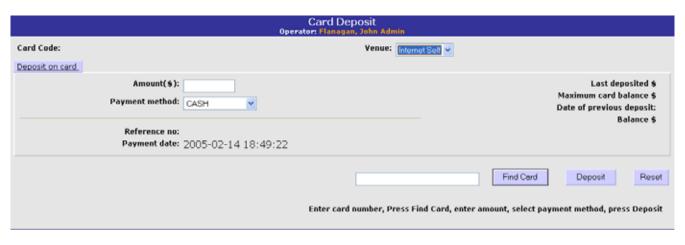
Under GSA pre-commitment strategies the player can:

- Set a maximum credit balance for the cashless GSA card account.
- Elect to <u>only</u> play with the cashless card account. If a
 player elects to play cashless only, then they cannot
 play with cash (coin/notes) in EGM machines the
 GSA authorisation process stops them and continues to
 inhibit the coin & note acceptors.
- Deposit funds using the Internet and credit card authorisation; or use cash or debit or credit cards by visiting a GSA point in a venue or mailing a deposit to

the GSA operators. Any other secure payment means can also be used.

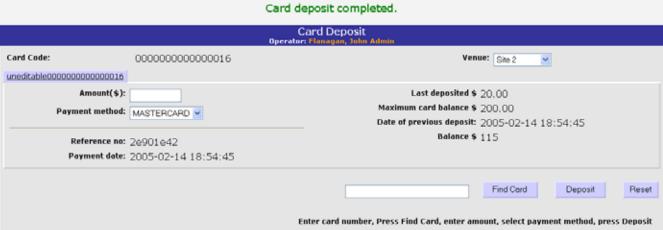
- 4. Players can have credit balances on their GSA card account re-paid to them in the form of a transfer to their bank account or a cheque. Fees are associated with this service.
- 5. All deposits and withdrawals, in fact any movement, in the balance of the account is written to the databases and a DEPOSIT report is available through the GSA Internet Self Maintenance facility at any time the player wishes to obtain a report. Reports may also be obtained via the mail, however, fees are associated with this method.
- 6. <u>If GSA active mode 2</u> is implemented the cashless transfer occurs directly from the GSA card account to the EGM machine via the EGM and GSA applications.

The GSA cashless facility places no money on the GSA card, the money is held centrally on the GSA Portal with access to balance and transactions protected by the need to have both the GSA card number and the correct PIN or PINs. Consequently, this cashless playing technique does not generate theft or fraud opportunities or place the player at risk of assault.





In this example player owning GSA card number 16 has deposited \$20.00 from their MASTERCARD at venue Site 2. The cashless card balance prior to the deposit was \$95.00, the last deposit being made on the 13th February 2005 at 01:37 and the maximum card balance permitted (a pre-commitment) is \$200.00.



The deposit is completed, note the **Last deposited** is \$20.00 and the **Balance** is now \$115.00 on the card.

A cashless GSA card balance enquiry facility is available. This can be accessed at the venue either from a venue operator enquiry by the player or at a venue based kiosk or by the player accessing their GSA card over the Internet.



Refunding funds from the GSA card to the player bank or credit accounts:



Here \$50.00 is to be credited to the player's MASTERCARD account. The funds reduce the balance in the account and write an audit transaction to the database.



Administration

Users:

Functionality to deal with setting up authorised users in venues, the Statutory Body, the GSA system operators and others are provided. User setup defines the access level of each authorised user and exactly what they can and cannot access and do.

Machines:

Information relating to the venue, location within the venue, the denomination of the EGM, the maximum number of lines, registration information and nature of game and further information is held by GSA for reporting and compliance purposes.

Modelling:

The applications that identify an individual as an "at risk" or "problem gambler" are encapsulated in a highly secure area of the Administration section of the secure GSA Portal. The modelling consists of a complex series of psychological and psychiatric based algorithms. These applications continually run and triggered individuals are contacted by either email, mail or a visit to the address details provided or alternatively the individual is <u>found</u> whilst playing in a venue and contacted at the venue where contact details have not been provided. Due to the commercial sensitivity of this area and algorithms no further details on this section are provided at this time.

Site Maintenance:

Details relating to licenced venues is set up and held here, including who to contact and how to contact them in the event of a triggered individual.

Email GSA:

An ability to email the GSA support area is provided.

In the following pages screen shots of these functional areas, with the exception of the modelling area are shown.



<u>USERS</u>

There are 2 classes of users, excluding players. Users based at venues are referred to as EMPLOYEES. Users who are the Statutory body, GSA operators or other non-venue based are referred to as PORTAL USERS.

What each category can do is very different and in each category the ability to access information, change information or print or otherwise run applications is determined by the LOGIN of the individual and their ACCESS LEVEL.

The ACCESS LEVEL categories are unlimited and are soft.

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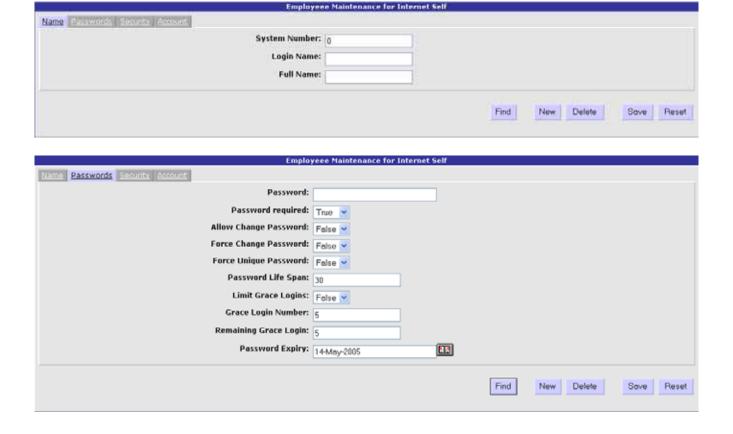
EMPLOYEES

GSA provides venues with an ability to generate timesheets, rosters and keep track of Employees hours in addition to controlling the registration of authorised venue based users who may be permitted to set up and issue GSA cards, change GSA card information, accept cashless card deposits and so on.

Security is *paramount* in these areas and this software makes extensive use of encryption techniques.

This software has been in commercial use for in excess of 2 years in various forms and there have been <u>no security</u> breaches.

Some screen shots are included showing the type of information held on an EMPLOYEE.



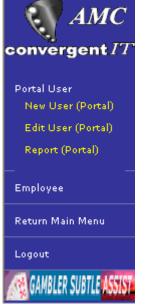
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Extensive reporting of Employee activity is provided. This includes what functions they have run and what cards they have *touched* and what they did to those card accounts.

PORTAL USERS



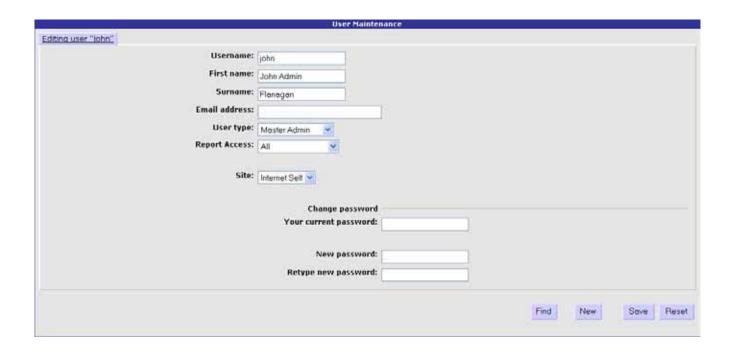
This section is traditionally used for Statutory access, nonvenue based access or management access.

All activities are fully tracked, including the source of the activity (TCP/IP address and the portal user).

Samples of the information are shown including the reporting drill-down.

Access to various functionality is controlled by the portal user type and access level for each portal user.

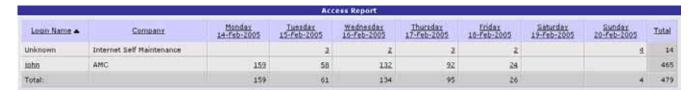
Each portal user is protected by password control.



PORTAL USER REPORT



The report shows portal users, who they belong to, their access level and when they last logged on. An appropriately authorised user can then examine in detail what any of these users has been doing through the *User Accesses* report.



The player internet accesses are summarised in this report and the details of which player accessed is controlled by a separate reporting mechanism. The summary information is shown to gauge the level of loading caused by player internet accesses.

Note the underlined name, john, and the counts under the various dates above the underline means there is access related information to be drilled down to. Reports may be obtained over all sites, over a nominated site and for a single week day by day or the last 7 weeks, the last 7 months, the last 7 years or the last 7 Mondays, etc.

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PORTAL USER ACCESS TRACE

User Extra Access Details - john for 15-Feb-2005							
Reference	Details						
User	john .						
Date	15-Feb-2005						
Time	00:28:29						
Site	Site 1						
User IP Address	211.26.51.55						
ISP Host	055.b.002.ade.primus.net.au						
Browser and Op System	Mozilla/4.0 (compatible: MSIE 6.0; Windows NT 5.1; SV1; .NET CLR 1.1.4322)						
Request	/gsa4/VenueSessionReport.php						
Full Request	/gsa-t/VenueSessionReport.php?site=10&option=1&byOption=0&filter=						
Access Level	Master Admin						
Information	Sessions						

This trace shows the user, "john" ran the "venuesessionreport" from Site 1 on the 15-Feb-2005 at 00:28 from machine with address 211.26.51.55 with ISP host 055.b.002.ade.iprimus.net.au using Internet Explorer 6.0 and the user has *Master Admin* access level and the information looked at was *Sessions*.

Security and privacy protection is a major function in the GSA software.

PLAYER ACCESS OVER THE INTERNET SELF MAINTENANCE

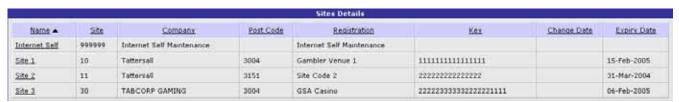
User Access Details - Unknown for 15-Feb-2005							
Time ▲	Company	Information	Site	IP Address			
09:59:26	999999	Legin - Card Number 0000000000000016 and Chain 999999	ALL	10-33.120.45			
13:10:43	999999	Login - Card Number 000000000000016 and Chain 999999	ALL	203.102.196.104			



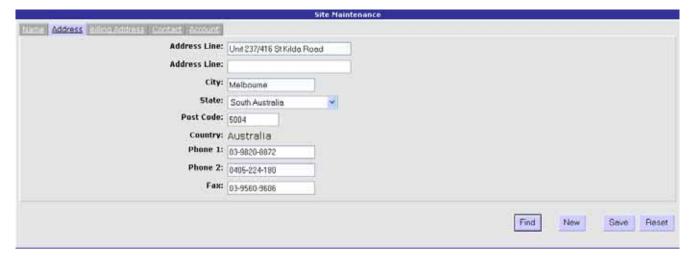
SITE MAINTENANCE

This section is where the information relating to venues and their allowed TCP/IP addresses, site contacts for triggered individual assistance and other administrative purposes are set up.

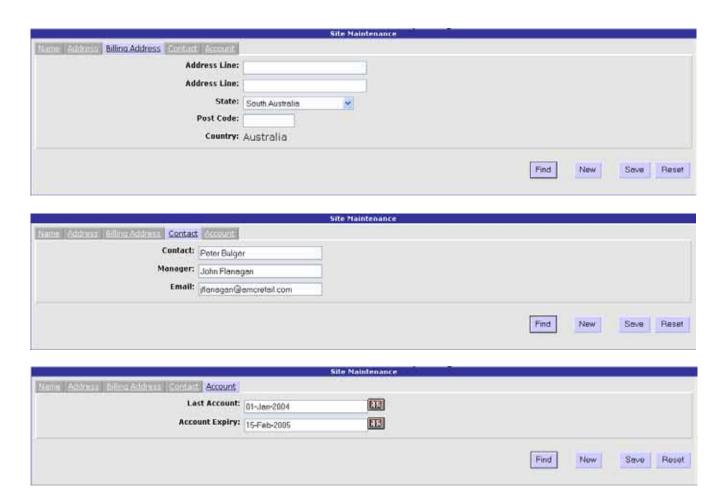
This section also contains the access point to the SUPPORT functions of GSA.





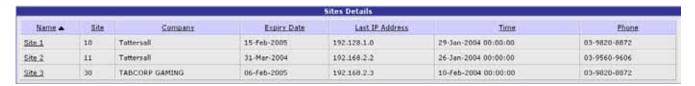


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TCP/IP OF SITES REPORT

This information is used by GSA to keep track of the sites and maintain communications with them. GSA does not require static TCP/IP addresses. The GSA site controller is always maintaining contact with the GSA Portal Host and consequently the TCP/IP address is always known to the GSA Portal host.



SITE CONTACTS - who to contact and how.

Sites Details:							
Name -	Site	Company	Post Code	Phone	Manager		
Internet Self	999999	Internet Self Maintenance					
Site 1	10	Tattersell	5004	03-9820-8872	John Flanegan		
Site 2	11	Tattersall	3151	03-9560-9606	Judy Charles		
Site 3	30	TABCORP GAMING	3004	03-9820-8872	John Flanagan		



SUPPORT

GSA shares the functionality of the other commercial portal based AMCCIT products with support being distributed to the individual sites, where required. This feature is used to distribute newsletters, software updates for venue based site controllers and other purposes including training manuals and the like.



MACHINE SET UP AND PARAMETERS

EGM machines can be set up indicating their position within the location, their network address (if any), the denomination, the maximum lines per play and the maximum value per play, licence and registration details and so on.

This information can be used by GSA in determining precommitment issues for players.

Machine payback ratios and the other relevant fiscal metering and other information can also be collected via the communications with the EGM machine protocol (QCOM, CMS, VLC) or the site controller using FTP or XML.

SAMPLE MACHINE SITE REPORT

Portal Machine Report - AMC Convergent IT										
<u>Machine</u> ▼	Position	Description	Value/Credit	Coin	Card	Chain	Site	Serial No	Licence No	Date Changed
0000000000000000	A10006	Pretty Sally in the Red Dress	0.50	No	Yes	Star Hotel Gaming	3	ABDEE-454	vicgov-22112	15-Feb-2004 00:00:00
00000000000000000	A10005	Captain Swaggies Treasure Chest	0.10	Yes	Yes	Star Hotel Gaming	3	ABCD-3322119	vicgov-334477	15-Feb-2004 00:00:00
000000000000000000000000000000000000000	A10003	Pirates Cove Extravaganza	0.02	Yes	No	Star Hotel Gaming	3	ABCDEFGH-122111	vicgov/0988	15-Feb-2004 00:00:00

This report is drilled down on to show the specific machine information.

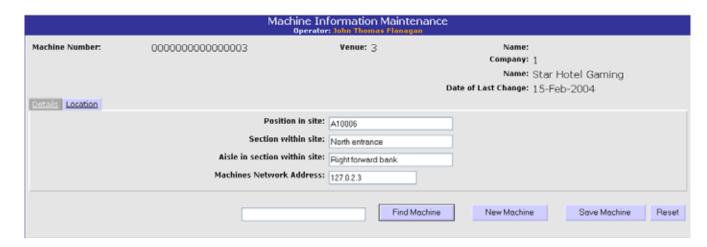
MACHINE DETAILS



The specific machine location in the venue is recorded enabling GSA to direct staff to the machine a particular player is using. This is used to reach players who have elected to remain anonymous.

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Considerable information is recorded against a machine this information is mainly concerned with the financial monitoring of the machine for regulatory, turnover, payback ratios and other administrative purposes rather than pre-commitments and harm minimisation or harm avoidance issues.

PLAYER REPORTING AND ACCESS TO THEIR INFORMATION TO CHANGE PRE-COMMITMENTS

Players may obtain access to the information GSA holds in relation to themselves from a range of sources:

- 1. Kiosks within a venue, if installed;
- 2. Telephonically requesting information;
- 3. Request mailing of information, fees may apply to cover postage and pettys;
- 4. Over the Internet.

The following example demonstrates the Internet Self Maintenance application available for GSA players to:

- 1. Amend or change personal details;
- 2. Change allowed pre-commitments;
- 3. Obtain activity statements online;
- 4. Deposit funds by credit or debit card to a GSA cashless account;
- 5. Obtain deposit history report;
- 6. Obtain a history of changes to their GSA card;
- 7. View session information of their playing activity;
- 8. View significant pre-commitment limit events.

The initial LOGIN screen is:



The login process requires both the GSA card number or email <u>and</u> the player password (PIN).

This is a secure login with encryption of passwords and nothing appears as clear text.



Basic tab

Fields with a white background can be changed by the player using the Internet Self Maintenance. Fields on a solid background can only be changed by authorised GSA operators either at a venue or a GSA point. In this example the player is <u>unable</u> to change the *Proof of Age, Limits (pre-commitment), Blocked, Status, Replacement card, Proof Age Method or Proof Age Reference* fields.



Limits Overall tab

A player can elect to set pre-commitments on <u>any</u> supported gambling form which by *default* is EGM/Casino machines and may include racing and lotto in the future.



EGM/Casino tab

A player can set the pre-commitments in terms of spend & time on a session, daily, weekly, monthly and yearly basis as well as time breaks between sessions and what value machines to <u>not</u> allow them to play.

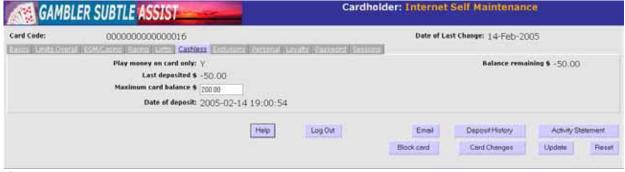
Additionally a player may elect to be asked a question at the time they reach a precommitment if they wish to override that limit. If they actively override this becomes a

factor in the "at risk" and "problem gambler" identification modelling. Whether a player is given the choice about enabling overrides or not is configurable at a global system level.





If multiple gambling forms are enabled and supported by the Statutory body additional tabs in the form covering them become visible to the player for which they can set precommitment limits. The two tab above show the forms for player pre-commitments in terms of racing and lotto.



Cashless tab

The player who has elected to play on a cashless basis cannot change that status currently via the web, they can either deposit funds to the card account which is held on the GSA Portal host using a credit or debit card or change the maximum card balance.



The *exclusions* tab contains days or dates upon which the player does not wish to be allowed to play. To activate this request the player provides a written request to a GSA point and the information is processed. Having been set up a written response is needed from the player to remove the specific exclusion.

In the example above the player has elected to not be allowed to play on *Pension/Pay days* starting from the 2nd April 2004 and with a cycle every 2 weeks.

Other specific exclusion days or events can be configured.



The player may amend their *Personal* details tab including address, email address and telephone numbers for contact by the GSA operators.



The *Loyalty* tab is where the player is able to maintain the loyalty scheme numbers for the various loyalty programs operated by licenced venues that they are a member of and wish to have updated with the session information of their activities as appropriate. This

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enables the player to reduce the number of cards they need to carry and avoids the need for them to remember to use the loyalty card. The GSA card <u>must</u> be inserted, depending on the mode implemented, and hence with this information GSA can ensure the player receives credit for their activity within the venue affiliated with the loyalty scheme(s) of which they are a member.



The *Password* tab is provided for the player to change their password (PIN) associated with their GSA card and Internet access to GSA. The passwords are encrypted.



The Sessions tab shows the player activity over the current month. The session information can be drilled-down to the session detail that includes the venue, the machine identity, the length of time, any pre-commitment limits reached, any exclusions attempted to breach, wins, losses, amount of funds played, and so on.



Each session shows the information above providing the player letting the player determine exactly what occurred.

SELECTABLE INTERNET PLAYER REPORTS



The *buttons* at the bottom section of the screen are controls and reports the player may select.

PLAYER GSA CARD CHANGES REPORT



Rec £▼	Notified Date	Reference	Blocked	Changes	Email	Venue	Operator
		No. changes:	164		No. blocks:	36	
579	2005-2-14 11:09 PM	542f25c3	No	Player maximum card balance changed from 0.00 to \$200.00.	acs_john@yahoo.com	11.	Flanegan, John Admin
565	2005-2-13 7:44 PM	f7fbec60	Yes	Blocking changed from Yes to No.	acs_john@yahoo.com	10	Flanegan, John Admin
564	2005-2-13 1:17 AM	58cbe34c	760	Player maximum card balance changed from 150.00 to \$200.00.	acs_john@yahoo.com	-1	Cardholder 00000000000000016 via Internet
561	2005-2-12 3:56 PM	6e380017	Yes	Blocking changed from No to Yes.	acs_john@yahoo.com	399999	Cardholder 0000000000000016 vio
560	2005-2-10 10:29 PM	dbf15973	No	Maximum Bet limit changed from \$ 35.0 to \$40.0. Session Break changed from : 120 minutes to 150 minutes.	acs_john@yahoo.com	999999	Flanegan, John Admin
559	2005-2-10 10:27 PM	6b50b9be	No	Maximum Bet limit changed from \$ 30.0 to \$35.0. Session Break changed from : 90 minutes to 120 minutes.	acs_john@yahoo.com	10	Flanegan, John Admir
558	2005-2-10 10:25 PM	c931c02d	No	Maximum bet amount limit changed from \$ 20.0 to \$30.0.	acs_john@yahoo.com	4	Cardholder 00000000000000016 vi
557	2005-2-10 10:22 PM	07ed6d20	No	Sessions amount limit changed from \$ 180.00 to \$120.00. Daily time limit changed from: 20.00 hours to \$22.00 hours. Maximum bet amount limit changed from \$ 30.0 to \$20.0. Break on reaching Maximum Spend or Time in a Session changed from: 80 minutes to 90 minutes.	acs_john@yahoo.com	-1	Cardholder 000000000000000016 wi Internet
\$56	2005-2-10 10:19 PM	af69fde6	No	Sessions amount limit changed from \$ 200,00 to \$100,00. Week limit changed from \$ 350,00 to \$450,00. Maximum bet amount limit changed from \$ 25.0 to \$30.0, break on reaching Maximum Spend or Time in a Session changed from: 90 minutes to 80 minutes.	acs_john@yahoo.com	-1	Cardholder 0000000000000016 vi Internet
555	2005-2:10 10:14 PM	f530404e	No	Maximum bet amount limit changed from \$ 30.0 to \$25.00. Time Break after reaching Maximum Spend or Time in a Session and starting a new Session changed from: 120 minutes to 90 minutes.	acs_john@yahoo.com	-1	Cardholder 0000000000000016 vi Internet
554	2005-2-10 10:14 PM	77365a99	No	Limits apply to racing changed from: No to Yes. Limits apply to lotto changed from: No to Yes.	acs_john@yahoo.com	-91	Cardholder 00000000000000016 vi
553	2005-2-10 9:58 PM	2ef04f01	No	Time Break after reaching Maximum Spend or Time in a Session and starting a new Session changed from: 30 minutes to 120 minutes.	acs_john@yahoo.com	4	Cardholder 000000000000000000016 vi
552	2005-2-10 9:55 PM	ce30e28c	No	Sessions amount limit changed from \$ 160.00 to \$200.00.	acs_john@yahoo.com	-1	Cardholder 000000000000000016 vi

This report is obtainable on demand by the player and reflects all changes made to their GSA card from any source whatsoever and who made the change. This ensures the player that requested changes have been made in accordance with their wishes and secondly lets them follow other changes including *blocks*.

PLAYER GSA CARD CASHLESS DEPOSIT REPORT



This report shows <u>all</u> deposit and payout receipts affecting the cashless GSA card account, including refunds to the player and funds transferred to an EGM machine. The information can be tracked over any date period the player desires.

PLAYER GSA CARD ACTIVITY STATEMENT REPORTS



This reporting structure provides the player with an easy to use powerful tool to understand a large number of things about their playing over any period of time. The calendar can be set to any date today or in the past. The report can be generated on a daily, weekly, monthly or yearly basis and then a range of different filters applied.

The filters may be a specific warning or block activity or any warning or block activity.

The type may be betting, winnings, net movement or sessions.

In the above example you can see card 16 played at Site 1 on 9-Feb, 10-Feb and 12-Feb.

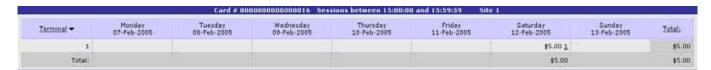


Clicking on the Site 1 the player is shown the times of each of their activities in the Site.

Clicking on the time reveals:



This enables the player to view the sessions they played in this time interval. Clicking on the link shows:



This indicates the player played terminal 1 on the 12-Feb and *bet* \$5.00, note the underlined 1 beside the \$5.00 by clicking on it the player sees the full session details.





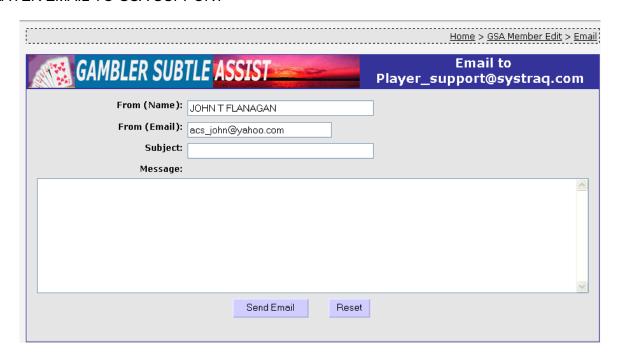
The player has been able to view the entire details of the session they were interested in. This gives to the player the ultimate power to always be able to know exactly what they did, no guessing and encourages them to play responsibly.

PLAYER SELF EXCLUSION (BLOCK) USING THE INTERNET SELF MAINTENANCE



The Player can *self block* or *exclude* themselves from being allowed to play EGM machines within a venue or <u>all</u> venues. The player is sent an email confirming their blocking of their card.

PLAYER EMAIL TO GSA SUPPORT



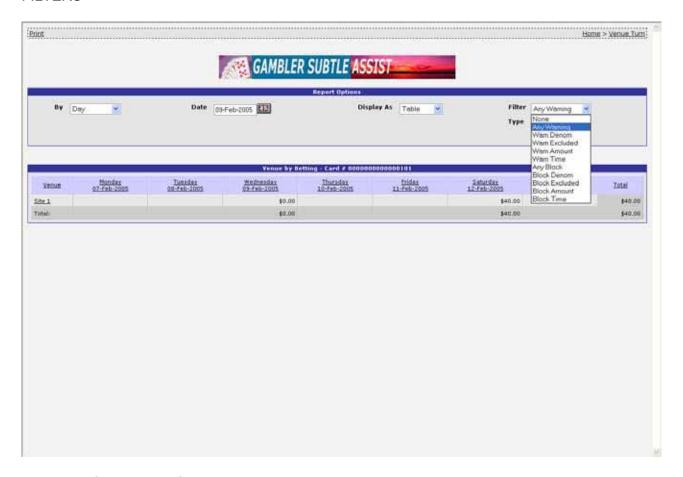
A player may direct any questions to the GSA operations and support area directly from the Internet Self Maintenance application. The email can cover any relevant matter or question the player has in relation to GSA and its operation.

LOGOUT SCREEN



PLAYER ACTIVITY STATEMENT & STATUTORY BODY REPORTING OPTIONS

FILTERS



The report filter option of any warnings has been selected.

The report shows that at Site 1 there were 2 warnings issued to players.

Drilling down on the Site 1 reveals:



The warnings happened in the hours shown and further drilling down shows:



The audit journal for the terminal session is shown and drilling down shows

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Session Header				
Reference	Information			
Venue	Site 1			
Terminal	1			
Session	1			
Card #	0000000000000101			
Date	09-Feb-2005			
Start Time	00:19:15			
End Time	00:19:35			
Duration	0 Minutes			
Machine Denomination	\$0.01			
Funds Advanced	\$0.00			
Total Winnings	\$0.00			
Denomination Warning	No			
Denomination Block	No			
Excluded Warning	Yes			
Excluded Block	No			
Amount Limit Warning	Yes			
Amount Limit Block	No			
Time Limit Warning	No			
Time Block	No			
Number Of Bets	0			
Number Of Wins	0			
Number Of Fund Updates	0			
Average Bet	\$0.00			
Average Win per Bet	\$0.00			
Average Win	\$0.00			
Average Time to Bet	0.00 Seconds			

The venue

The players session number
The player GSA card number
Date
Session start time
Session end time
Session duration in this case zero.
Machine denomination.
Funds inserted – none as card rejected due limit reached.

Player was excluded from playing.

Reason player excluded was *pre-commitment amount* limit had been reached.

Reference	Information
Venue	Site 1
Terminal	1
Session	8
Card #	0000000000000101
Date	12-Feb-2005
Start Time	16:00:06
End Time	16:00:34
Duration	0 Minutes
Machine Denomination	\$1.00
Funds Advanced	\$450.00
Total Loss	\$40.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	Yes
Amount Limit Block	Yes
Time Limit Warning	No
Time Block	No
Number Of Bets	2
Number Of Wins	0
Number Of Fund Updates	1
Average Bet	\$20.00
Average Win per Bet	\$0.00
Average Win	\$0.00
Average Time to Bet	0.00 Seconds

Warning message about amount limit given

Play *block* due to amount limit having been reached.

Terminal 1, Session 8 Card # 000000000000101 Showing: <mark>Any Warning</mark> : Site 1					
<u>Time</u>	<u>Journal</u>	<u>Bet</u>	<u>Win</u>	<u>Net Movement</u>	<u>Funds Added</u>
16:00:30	328	\$20.00		\$20.00	
16:00:24	327	\$20.00		\$20.00	
16:00:14	326				\$450.00
		\$40.00		\$40.00	\$450.00

The players activities that lead to the warning and block in the example above.

An excluded player block is shown below:

Session Header			
Reference	Information		
Venue	Site 1		
Terminal	1		
Session	9		
Card #	0000000000000101		
Date	12-Feb-2005		
Start Time	16:01:37		
End Time	16:01:37		
Duration	0 Minutes		
Machine Denomination	\$1.00		
Funds Advanced	\$0.00		
Total Winnings	\$0.00		
Denomination Warning	No		
Denomination Block	No		
Excluded Warning	No		
Excluded Block	Yes		
Amount Limit Warning	No		
Amount Limit Block	No		
Time Limit Warning	No		
Time Block	No		
Number Of Bets	0		
Number Of Wins	0		
Number Of Fund Updates	0		
Average Bet	\$0.00		
Average Win per Bet	\$0.00		
Average Win	\$0.00		
Average Time to Bet	0.00 Seconds		

CHANGES MADE TO A PLAYER PROFILE GENERATES EMAILS TO PLAYER

		Card Maintenance Operator: John Thomas Flanagan
Card Code:	000000000000000000000000000000000000000	Venue: Site 2 V Location inside venue: 11 Date of Last Change: 15-Mar-2005
Dis	Proof of Age: Yes V Limits: Yes V Blocked: No Y Created: 17-Feb-2003	State (Residence): SOUTHAUSTRALIA Country (Residence): AUSTRALIA Proof Age Method (photo ID): Drivers licence Proof Age Reference Proof 2084 396 2
		Status: Active V

The email response to the player indicates each field that has been changed.

It shows what the field was and what it has been changed to.

A reference number is allocated by the system and the player is directed to the GSA point where the change was made if appropriate and informed how to contact the person who activated the player's request.

SAMPLE EMAIL FORWARDED TO PLAYER FOLLOWING CARD CHANGES

GAMBLER SUBTLE ASSIST CARD PROFILE UPDATE: CONFIDENTIAL

Date: 15/03/2005

Dear Cardholder 0000000000000016,

On 15/03/2005 the following changes were made to your Gambler Subtle Assist card profile either directly by you via the Internet

or as recently requested in correspondence with us.

The changes are effective from 15/03/2005 time: 00:29.

The changes requested were:

State changed from: VIC to SA.

Sessions amount limit changed from \$ 2.00 to \$200.00.

Day limit changed from \$ 600.00 to \$550.00.

Week limit changed from \$ 900.00 to \$850.00.

Month limit changed from \$ 1200.00 to \$1150.00.

Year limit changed from \$ 15000.00 to \$13000.00.

Excluded machine type changed from \$ 0.50 to \$1.00.

Daily time limit changed from: 9.00 hours to 6.00 hours.

Weekly time limit changed from: 12.00 hours to 18.00 hours.

Monthly time limit changed from: 24.00 hours to 28.00 hours.

Maximum Bet limit changed from \$ 600.00 to \$20.00.

Session Break changed from : 5 minutes to 15 minutes.

The changes were processed by John Thomas Flanagan at:

Site 2 Unit 237/416 St Kilda Road, Melbourne, South Australia 5004

Your reference number for these changes is: 58e42532.

Should you have any queries or wish to make further changes please do not hesitate to contact us at our email address in this

email (webmaster@systraq.com) or at the venue (jflanagan@amcretail.com).

Alternatively, you may contact the venue by telephone where the changes were made on 03-9820-8877 for assistance.

Thank you for your request and we are pleased to be of service.

Yours faithfully,

John T. Flanagan Director Gambler Subtle Assist Card Services

CARD BLOCK REQUEST PROCESSING WITH EMAIL RESPONSE TO PLAYER

Email successfully sent to acs_john@yahoo.com						
Card block request was successfully saved						
Card Block Request Operator: John Thomas Flanagan						
Card Code:	000000000000016	Venue: Site 2 Location in venue: 11 Date of Last Change: 15-Mar-2005				
Blocked: Yes ▼						
		Find Card Block Card Reset				

SAMPLE EMAIL ALERTING PLAYER THE GSA CARD IS BLOCKED

GAMBLER SUBTLE ASSIST CARD PROFILE UPDATE: CONFIDENTIAL - CARD BLOCK

Date: 15/03/2005

Dear Cardholder 0000000000000016,

On 15/03/2005 acting in accordance with your expressed wishes we have BLOCKED your Gambler Subtle Assist card.

From the effective date and time your card will no longer activate gaming or gambling activities at any venue within the State of South Australia.

The insertion of a card into the poker machine or its swiping at a gaming machine or, depending on your profile at betting at a racing meeting or Lotto purchase point and verification the card is both valid and active is an essential step in the gambling and gaming process in South Australia.

The BLOCK on card 00000000000000016 is effective from 15/03/2005 time: 00:00.

The changes were processed by John Thomas Flanagan at:

Site 2 Unit 237/416 St Kilda Road, Melbourne, South Australia

Your reference number for the blocking of the card is: a8e87b34.

Should you have any queries or wish to make further changes please do not hesitate to contact us at our email address in this email (webmaster@systraq.com) or at the venue (jflanagan@amcretail.com).

Alternatively, you may contact the venue by telephone where the changes were made on 08-9820-8877 for assistance.

Thank you for your request and we are pleased to be of service.

Yours faithfully,

John T. Flanagan Director Gambler Subtle Assist Card Services

RE-ACTIVATING A PLAYER GSA CARD



Emails are generated or SMS or mail letters are generated for those players who have provided appropriate contact details for the following circumstances:

- 1. Changes to GSA card details.
- 2. Blocking requests.
- 3. Re-activation requests.
- 4. Triggering by GSA modelling.