Consultation on application to amend Minimum Technical Standards for Casino Electronic Monitoring Systems

November 2015

## Detail of the application

In March 2014 the Department consulted on an application by Christchurch Casino Limited to implement a facility to provide card-based cashless gambling on gaming machines. That is, a facility whereby patrons who have money in a casino deposit account (and have therefore been subject to customer due diligence) are able to access that account at gaming machines through the use of a player card.

After considering the submissions on the application the Secretary has approved the application. The proposed cashless front money facility has the following features:

* In order to use the facility patrons must be members of the casino loyalty programme, hold a casino deposit account and have funds on deposit in the account;
* Patrons may, after inserting their loyalty cards, download funds from their deposit accounts directly to a gaming machine;
* Multiple downloads can be made but each download may be no more than $500 for non-VIP patrons and no more than $5999 for VIP patrons;
* Credits cannot be uploaded back to the deposit account but must be either played or cashed out in the usual manner.

The Secretary now proposes to amend the Minimum Technical Requirements for Casino Electronic Monitoring Systems and the New Zealand Casino Gaming Machine Appendix to the Australian/New Zealand Gaming Machine National Standard Revision 10.0 to implement the approval.

### Minimum Technical Requirements for Casino Electronic Monitoring Systems - New part 5.5

The Secretary proposes to insert a new part 5.5 into the Minimum Technical Requirements for Casino Electronic Monitoring Systems. The proposed new part 5.5 is set out below.

Note that the proposed new part is silent on the precise linkage between a front money account and a player’s loyalty account and/or pre-commitment facility to the extent that necessary audit information may be collected and stored on either account as convenient, and the gaming machine player interface is not necessarily specific to any account.

The assumption is that the use of a player’s loyalty card is the prime control required to initiate a download of front money credits but another screen linked specifically to front money may then be activated or the player’s loyalty account card screen can be used.

### 5.5. Front Money Electronic Credit Transfer

### Interpretation

Loyalty Card means a card used in a casino loyalty programme where all transactions involving the use of the card are recorded against a player’s account.

Cash equivalent credits are cashless credits electronically downloaded to a gaming machine where any one credit has an equivalent whole dollar cash value.

5.5.1 A “front money account” for the purposes of this section is a casino deposit account into which a player deposits funds at the casino cage/cash desk that can be used for the purpose of downloading cash equivalent credits to a gaming machine.

5.5.2 The player is a member of the Casino Loyalty Programme and has been issued with a valid player loyalty card.

5.5.3 If a Casino Electronic Monitoring System (CEMS) provides a system for the single or multiple download transactions of a cash equivalent credit amount from a front money account to a gaming machine, these standards apply to that system not withstanding section 1.2.9

5.5.4 A pre-commitment facility must be available for player use and presented as an option when a CEMS offers front money electronic credit transfers.

5.5.5 A Player’s Front Money Account cash balance can be downloaded to an EGM in the form of cash equivalent cashless credits provided that:

1. The gaming machine is enabled for play and is not in a non-playable state (such as fault conditions, audit mode, demonstration mode, and tournament mode for example);
2. A player’s front money account and a player’s loyalty card account are linked;
3. A player’s loyalty card is inserted into the EGM card reader and correctly authenticated before any front money account equivalent cash credits can be downloaded;
4. Player Card Authentication requires, at a minimum, the use of a 4-digit pin number or other protected means;
5. A player has selected a download amount for any one transaction download that is less than or equal to but does not exceed:
	1. $5,999 for a VIP member of a casino loyalty programme
	2. $500 for a non-VIP member of a casino loyalty programme
6. There is no restriction on the number of separate transaction downloads providing the sum total of the credit amount downloaded does not:
	1. Exceed the cash balance of the player’s front money account; or
	2. Exceed any gaming machine configured limits for cash equivalent credit download e.g. maximum credits allowed on players credit meter.
7. Partial transfer is acceptable providing the player is clearly notified that the transaction was for a lesser amount than that requested.

5.5.6 Once front money account credits are downloaded to a gaming machine credit meter these credits or any other credits on the EGM credit meter cannot be uploaded back to the front money account or any other account. That is, following a download of cash equivalent credits from a front money account an EGM can only cash-out player credits.

5.5.7 The EGM Player Interface must be capable of providing details of every download transaction initiated which, as a minimum, must show

1. The type of transaction e.g. front money account credit download
2. The transaction value
3. The date and time of transaction
4. The player’s loyalty account number or a unique transaction number, either of which can be used to authenticate the source of downloadable credits
5. Either confirmation of a transaction or, if the transaction failed, a descriptive message indicating why the transaction did not complete e.g. communications failure, insufficient funds.

### New Zealand Casino Gaming Machine Appendix to the Australian/New Zealand Gaming Machine National Standard Revision 10.0 – new section DIA3.6

The Secretary proposes to insert new section DIA3.6 into the New Zealand Casino Gaming Machine Appendix to the Australian/New Zealand Gaming Machine National Standard Revision 10.0. The proposed new section is set out below.

### DIA3.6 Front Money Account Electronic Cash Equivalent Credit Cashless Download (Ref NS 3.18.6)

1. An EGM must record, as a minimum, the last twenty-five (25) front money cashless transactions. As a minimum, the following data for each transaction must be displayed:
	1. Type of transaction e.g. front money account credit download;
	2. The amount downloaded;
	3. The time and date; and
	4. The player’s loyalty account number or a unique transaction number, either of which can be used to authenticate the source of downloadable credits.
2. Cashless meters are as defined in **NS10.1 section 3.3**.

## Schematic high level front money flow diagram

A schematic of the front money system is attached for information and is not part of the proposed amendments.

## Submissions

The Department seeks your comments on the application. Please provide any submissions to the Department by Friday 4 December 2015. Submissions can be sent to Cath Anyan, Senior Advisor at cath.anyan@dia.govt.nz, or to:

The Department of Internal Affairs Te Tari Taiwhenua
PO Box 805
Wellington 6140

If an amendment is made to the minimum requirements following this consultation a notice will be published in the New Zealand Gazette stating that the minimum requirements have been amended and the date on which the changes take effect.

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