

THE COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS GAMING COMMISSION
PUBLIC HEARING

REGULATIONS: 205 CMR 135, 205 CMR 143, 205 CMR 144
205 CMR 145, 205 CMR 101, 205 CMR 115, 205 CMR 116

BEFORE: CHAIRMAN STEPHEN CROSBY

June 17, 2014, 1:00 p.m. - 1:30 p.m.

OFFICE OF THE DIVISION OF INSURANCE

First Floor, Hearing Room E

1000 Washington Street

Boston, Massachusetts

1 P R O C E E D I N G S

2
3 CHAIRMAN CROSBY: Good afternoon.

4 Today is Tuesday, June 17, 2014. This is a
5 public hearing before the Massachusetts Gaming
6 Commission. I'm Stephen Crosby, Chairman of the
7 Commission.

8 This hearing is being convened
9 pursuant to Mass. General Laws Chapter 30A,
10 section 2 and Massachusetts General Law Chapter
11 23K, section 5. Before we begin, the Commission
12 would like to thank you all for being here.

13 This is a public hearing. It is critically
14 important that you, the public, be a part of our
15 rulemaking process to ensure that the Commission
16 achieves the best results possible.

17 The purpose of this public hearing
18 is to offer any interested person or group an
19 opportunity to comment on a proposed change of
20 the Commission's regulations. This is not a
21 question-and-answer period or a debate.

22 Once we begin, anybody who wishes to
23 comment on the proposal may raise their hand and
24 be recognized by the Commission. They can then

1 proceed to offer their comments.

2 There are three sets of regulations
3 on the agenda for comment today. The first, 205
4 CMR 135 contains new regulations governing the
5 Commission's oversight and monitoring of the
6 construction process of the gaming
7 establishments. The second 205 CMR 143 through
8 145 contain new regulations pertaining to gaming
9 devices.

10 Specifically, Section 143 sets the
11 standards for gaming devices including slot
12 machines and systems, the provision of real-time
13 stream of data and other requirements related to
14 slot machines and the provision of data.

15 Section 144 governs the procedure
16 for permitting and registering gaming devices
17 and approvals of independent testing labs. And
18 section 145 governs the possession of slot
19 machines.

20 The third set of regulations 205 CMR
21 101, 115 and 116 are amendments to address new
22 qualifiers for suitability determination and
23 licensing.

24 These are the proposals that we will

1 now hear comments on. The Commission requests
2 that all speakers please identify themselves
3 prior to commenting, also please be sure to keep
4 your voices up as this hearing is being
5 recorded. With that, we will now open up the
6 floor for comment. If you want to speak, raise
7 your hand.

8 You're all here to just watch.
9 That's interesting. I thought you were here to
10 speak. All right. Well, we'll wait a little
11 while make sure nobody comes in. This is
12 required by law. So, we have to do this.
13 Nobody has to speak.

14 We have received a lot of comments.
15 I thought people were going to come and talk
16 about it as well.

17 MR. MEDLIN: May I ask a question?

18 CHAIRMAN CROSBY: Sure. Please come
19 up here.

20 MR. MEDLIN: My name is Mike Medlin.
21 I am from a company called Novomatic America.
22 It's out of Deerfield Beach, Florida. And I am
23 here with particular interest in the slot
24 machine provisions.

1 I wanted to ask the Commission, you
2 identify a number of legal ramifications
3 pertaining to slot machines. Are you going to
4 be discussing those issues today?

5 CHAIRMAN CROSBY: No. This is
6 purely to take comments on the regs., which have
7 been out there for discussion. They were
8 published, we invited comment. And then once we
9 get the comment that will be reviewed by staff
10 and by the Commissioners. Then it will be on
11 the agenda for a public conversation at -- is it
12 our next meeting?

13 MR. GROSSMAN: No, it's a couple
14 out.

15 CHAIRMAN CROSBY: A couple of
16 meetings out.

17 MR. MEDLIN: So, there is no
18 discussion of possible changes to the
19 regulations that have been published?

20 CHAIRMAN CROSBY: Not at the moment.
21 The only discussion is coming from people that
22 have a comment to make about it. People who
23 have suggestions and that's what we are here
24 today to invite.

1 But we will be discussing the
2 possible changes at the meeting in probably two
3 meetings out. That will all be posted so you
4 can see what's happening and when.

5 MR. MEDLIN: Thank you.

6 CHAIRMAN CROSBY: What's standard
7 operating procedure for how long to wait?

8 MR. GROSSMAN: It is 1:00 now. I
9 would give it about 10 minutes or so.

10 CHAIRMAN CROSBY: Hello. We've
11 started our meeting. We've invited speakers.
12 Are you here to speak or are you here to listen?
13 I was talking to you guys who just came in.

14 MR. MULLALLY: Kevin Mullally from
15 GLI and Patrick Moore. The answer is yes and
16 yes.

17 CHAIRMAN CROSBY: The other folks
18 who are here ahead of you are just here to
19 listen. So, I'm inviting people to come up.
20 So, whoever wants to come first, please do.

21 I forgot to introduce our staff who
22 are here. John Glennon is our CIO Chief
23 Information Officer. Todd Grossman is our
24 Deputy General Counsel. And we have two of our

1 staff attorneys, Artem Shtatnov and Danielle
2 Holmes from our General Counsel's office.

3 Why don't you guys introduce
4 yourselves and fire away.

5 MR. MULLALLY: Thank you, Mr.
6 Chairman. Kevin Mullally, Vice President of
7 Government Relations and General Counsel for
8 Gaming Laboratories International. I'm here
9 with Patrick Moore, our Director of Technical
10 Compliance.

11 I appreciate the opportunity to be
12 here today with you and the staff. We did
13 submit written comments. So, we will not go
14 over all of them. But we thought we might try
15 to summarize some of those to the extent that
16 the Commission might have some questions or the
17 staff to allow some interactivity.

18 So, I think I'll let Patrick take
19 the first couple of comments. And then I will
20 cover -- Patrick will cover the things that are
21 more technical in nature and I'll cover the
22 things that are more policy in nature.

23 CHAIRMAN CROSBY: Okay.

24 MR. MOORE: Good day. Again, my

1 name is Patrick Moore. I'm a Senior Director of
2 Tech. Compliance with Gaming Laboratories
3 International.

4 We have submitted comments by the
5 deadline yesterday. We sent those in digitally.
6 Just a few of them, I think if anything just
7 supporting our comments. And then obviously
8 we'll be available for any follow-up questions
9 that would result from those comments.

10 I will state here initially with
11 reference 143.01, part four. I think our
12 comments really sort of range from just sort of
13 helpful comments to ones that are probably a
14 little bit more detailed and really trying to
15 assist the Commission in any way we can based on
16 our experience in the gaming industry.

17 Within this reference, there is a
18 comment about basically the way that a slot
19 machine should respond to a loss of
20 communication with the central system or the
21 Commission's system. And I believe that the
22 rule in its current form was written as a way to
23 be the most pragmatic as possible, assuming that
24 maybe it was too severe to have the game

1 immediately cease its functions when it loses
2 communications, and trying to build in basically
3 a parameter for the game to be able to continue
4 operations in escrow or buffer these
5 transactional events for a period of time until
6 such time that that buffer is filled. Then the
7 game would then be disabled.

8 I think the rule was written with
9 very valid intent of trying to be as reasonable
10 as possible. But basically, today the games
11 simply just do not really operate in that
12 manner. So, games are either really operating
13 functional and communicating or when that loss
14 comes to a system as important as obviously the
15 Commission's monitoring system, when that
16 communication ceases, the game will then cease.
17 And there will be no further transactions on
18 that game.

19 So, that's basically the way the
20 games operate today. Do I think that the
21 developers in this arena can absolutely build a
22 more elegant solution to fit this rule, I too.
23 But I think what you'll likely see is that the
24 games today when that communication is lost,

1 they'll simply disable for play. If a player
2 is on the game, it will allow them to sort of
3 elegantly cash out, get what they need and the
4 player is made whole, but the game will then be
5 disabled from use at that time. That's the
6 basic coverage of that comment.

7 CHAIRMAN CROSBY: Okay.

8 MR. MOORE: The next was 143.12.
9 This was obviously within the earlier parts of
10 the draft regulation, you went through a number
11 of industry standards which you were adopting by
12 reference and then making some minor exceptions
13 with those.

14 It looks like largely these were GLI
15 standards. These are industry standards that we
16 had really so of proctored more than anything
17 else. Meaning that we had pulled together a lot
18 of existing industry standards from governments
19 around the world, really collating them into a
20 single document. Sent them out for really
21 worldwide review, took those comments in and
22 ultimately ended up with our GLI standard series
23 covering any number of technologies.

24 There's one of interest that we

1 commented on was our GLI 27 document which is a
2 -- while it falls within our standard series,
3 it's actually a document that was -- If you
4 read the foreword of the document, there's a
5 very thoughtful part of the document that talks
6 about the fact that it's really not meant to be
7 adopted as a standard of reference or a standard
8 that would ultimately be tested to.

9 And that it's really more of a
10 guideline or a reference for regulators to set a
11 baseline for network security. That's fully
12 intentional because network security, as I know
13 Mr. Glennon can attest to, it's a very, very
14 fluid area of IT technology. And people can
15 basically accomplish things in very different
16 ways. And it's also a constantly changing
17 technology as well. Changing probably every 18
18 months or so pretty dramatically.

19 With GLI 27, we really tried to set
20 a baseline that a regulator who knows nothing
21 about network security could go in there and
22 actually start to understand some of the terms
23 about network security, some of the principles,
24 guidelines, those types of things. But it

1 really wasn't meant to be a standard like a GLI
2 11, like a GLI 12, like a GLI 13 where the
3 testing laboratories would actually test and
4 certify to that standard throughout their
5 process.

6 I just wanted to obviously point out
7 that you could have an issue where if there is
8 an adoption, a straight adoption of GLI 27 and
9 the test labs are basically required to test and
10 certify to that, you could have some situations
11 where there is, let's say companies through
12 their Sarbanes-Oxley compliance or some other
13 types of certifications and accreditations that
14 they have may have a network security program
15 that's completely aligned with that that may not
16 necessarily be aligned with GLI 27.

17 So, it could be just an unintended
18 consequence of a direct adoption. But you may
19 wish to point to it as a helpful reference or
20 should be based on principles or guidelines as
21 discussed within GLI 27.

22 MR. MULLALLY: Mr. Chairman, 144.02.

23 CHAIRMAN CROSBY: I'm sorry. Excuse
24 me, before you do that. There is a sign-in

1 sheet here. I think it's in front of you, Todd.
2 Maybe you could just pass that around and make
3 sure that we do want to get everybody signed in.
4 I'm sorry.

5 MR. MULLALLY: And of course, if you
6 have any questions or the staff has any
7 questions during our comments, we are certainly
8 available to try to answer those.

9 144.02, paragraph four, requires the
10 gaming vendor to promptly notify the Commission
11 of any negative action taken in another
12 jurisdiction or if it becomes aware of an issue
13 that may negatively impact the reporting of
14 revenue, game outcome or the integrity of a
15 device that has been submitted to the Commission
16 for permitting or has been permitted.

17 While this is a common requirement
18 in most jurisdictions, just a little
19 wordsmithing and suggestions. It's kind of hard
20 sometimes to define promptly notify. And
21 there's a bunching of a couple of things that
22 may need to be decoupled.

23 Promptly notifying of any negative
24 action is not really that big of a problem. If

1 the lab takes formal action for a recommended
2 upgrade or a relocation, getting that
3 information out to regulators is pretty
4 systematic and can be done very efficiently.

5 The issue that gets a little fuzzier
6 is what we define as become an issue that may
7 negatively impact the reporting of revenue, game
8 outcome or the integrity of a gaming device.
9 Sometimes these things require a bit of
10 investigation to determine if there's a problem
11 or not a problem. So, we're big believers in
12 having clearly defined expectations or
13 responsibilities. And I'm not sure that we get
14 there with this exact wording.

15 So, we would suggest either changing
16 it to something within a 48-hour period or
17 separates these two requirements and change it
18 to within a reasonable amount of time, because
19 so much of these things are going to be fact-
20 based, situationally based. At least we could
21 try to work with staff to try to come up with
22 some type of language that gives it -- All we're
23 asking for, I guess is clear guidance and a
24 meeting of the minds as to what will be

1 expected --

2 CHAIRMAN CROSBY: Okay.

3 MR. MULLALLY: -- so we're not
4 having to make judgment calls on a regular basis
5 or flooding you with a whole bunch of
6 information that you may not want.

7 CHAIRMAN CROSBY: Right.

8 MR. MOORE: The next one and we
9 probably spent the most time I think commenting
10 on this one, and it could be based too on just
11 sort of our misunderstanding of the original
12 intent. This is 144.04, part five. And when I
13 listened to the last meeting --

14 CHAIRMAN CROSBY: Form of
15 application?

16 MR. MOORE: No, I'm sorry. This --

17 CHAIRMAN CROSBY: 144.05?

18 MR. MOORE: 144.04, part five.

19 MR. MULLALLY: Paragraph five.

20 MR. MOORE: Sorry, paragraph five.

21 CHAIRMAN CROSBY: 144.04, paragraph
22 five, it starts out the independent testing lab?

23 MR. MOORE: Yes, Sir. When we read
24 this, we obviously believe that it was set up as

1 a way, again, for the Commission to be very
2 pragmatic, understanding that they'll be opening
3 up their environment to multiple test
4 laboratories that will be submitting results to
5 the Commission for final approval. So,
6 essentially performing preapproval testing for
7 the Commonwealth.

8 That trying to basically set up a
9 program for the reliance on results that may
10 have come from other laboratories. Now, what
11 the rule says to our reading here was basically
12 that there's two possible options that you have
13 as an ITL when you determine whether or not you
14 can utilize results from another laboratory.

15 The first one being that you've been
16 able to come to a finding that the methods were
17 reliable and that there's no indication that the
18 results are somehow incorrect from the other
19 laboratory. Or that you're able to derive that
20 the game or system has been operating in another
21 jurisdiction for approximately six months and
22 there's been nothing sort of externalized on
23 that game.

24 There's no indication that that game

1 after running for six months of time, sort of
2 irregardless of how much activity has taken
3 place within six months, as long as there's no
4 sort of negative reports about that game that
5 those results can be relied upon.

6 So, our comment was really based on
7 I would say from the core of our accreditation,
8 which is an earlier requirement of the
9 Commission that the ITLs have a certain level of
10 accreditation. And it's typically ISO 17025 and
11 17020. So, basically laboratory and testing
12 inspection accreditation.

13 And what we've tried to say here in
14 our comments, and probably not as eloquently as
15 we could, is basically that this type of process
16 or model for using other labs' results isn't
17 really consistent with what that accreditation
18 allows. So, for an accredited laboratory to
19 utilize another laboratory's results, there
20 actually has to be a valid subcontracting
21 agreement between these laboratories.

22 That's for a number of reasons. It
23 provides the necessary access to look at the
24 actual methods that were employed by these labs

1 so that we can perform due diligence on the
2 quality of the work that is taking place in
3 these other laboratories. Basically, only
4 within that formal subcontracting agreement are
5 accredited labs able to rely on the results of
6 others.

7 Then obviously, the item B within
8 paragraph five is probably a little bit more
9 concerning in the fact that again, I'd like any
10 requirement that's based in reasonableness where
11 a jurisdiction is trying to be pragmatic. But
12 this one is a little bit of a concern because
13 you're basically creating a bypass, a potential
14 bypass for something that maybe isn't
15 necessarily based in science.

16 So, something residing in the field
17 for six months not having some type of forward
18 facing, external faults is not necessarily
19 enough of an indicator that that game is
20 compliant or operating compliantly. There's
21 just too many other things that could be
22 happening with the game that aren't necessarily
23 externalizing themselves within a six-month
24 period for something as important as testing and

1 certification for the integrity of gaming to be
2 relied upon for sort of that bypass. So, think
3 that was sort of our concern there.

4 And I think (A) has merit as long as
5 the methods that -- the process that they use to
6 confirm (A) aligns with what our accreditation
7 says that it needs to be. And what basically
8 again any lab that plans to do business in
9 Massachusetts who is going to have to have that
10 level of accreditation, as long as that process,
11 their finding that the methods described in
12 earlier tests are reliable and there's no
13 indication that data are incorrect. As long as
14 (A) is based on an accredited process of a
15 subcontracting agreement then we believe that
16 that's sound.

17 So, I think that we just in our
18 comments we sort of just went into, I think, the
19 accreditation issues and then just worrying
20 they're being set against a date and just
21 precedent that ultimately more risk falls onto
22 the Commonwealth in that case. And we're not
23 sure that's what you are aiming for with that
24 requirement.

1 MR. MULLALLY: Another thing to tie
2 this back to the previous rule that I commented
3 on with regard to reporting or negative
4 activity, theoretically it's possible here
5 because if you were relying on just simply the
6 fact that it had been approved in another
7 jurisdiction and been operating for six months,
8 what you're missing is a direct certification
9 from one of your testing labs.

10 So, it's theoretically possible,
11 although I'm not going to say that it's
12 tremendously likely, but it is certainly
13 possible that let's say you had a device that
14 was approved in another state or even in
15 Singapore, in another country, and an anomaly
16 arose with that machine. And it was under
17 investigation.

18 And the lab was directed by another
19 regulator to not share the contents of that
20 investigation with anybody outside the
21 regulatory agency. That would put the lab in a
22 very difficult position where you would be
23 relying on something from another jurisdiction.
24 That jurisdiction has no obligation to you. And

1 also the lab has no obligation to you because
2 the lab would not have certified that for the
3 Commonwealth.

4 CHAIRMAN CROSBY: This as it's
5 written, this seems to say that an ITL could
6 approve a device that had been approved in
7 another jurisdiction if it had been tested by an
8 independent lab, but it wouldn't have to be an
9 accredited gaming lab according to this, right?

10 MR. MOORE: I think in an earlier
11 section it talks about any ITL doing business in
12 Mass. would have to have that certain level of
13 accreditation.

14 CHAIRMAN CROSBY: Right. But this
15 says the independent testing lab may only rely
16 on testing conducted by third-party -- If you're
17 relying on somebody else's work to approve a
18 device -- Am I missing something here?

19 There's nothing here that it
20 requires that it had been approved by an
21 accredited firm. The ITL that was doing it
22 would be an accredited firm. But this would
23 permit relying on some other jurisdiction's
24 review process or testing process, which

1 wouldn't have to have been done by what we would
2 consider an accredited lab?

3 MR. MOORE: Sure. That's a
4 possibility. You still have a handful of states
5 who -- Pennsylvania and New Jersey and Michigan
6 who still do their own testing and likely maybe
7 don't have an accreditation.

8 CHAIRMAN CROSBY: Right, or some
9 other country theoretically like in your
10 Singapore model. Okay.

11 MR. MULLALLY: Or even a foreign lab
12 that may have an accreditation, but it's not
13 really doing active business in the United
14 States.

15 MR. MOORE: Then obviously the ITL
16 ultimately providing certification to Mass.
17 would have to have that accreditation per rule.
18 The risk would then fall to us as far as saying
19 do we want to rely on results from those other
20 agencies.

21 CHAIRMAN CROSBY: Right.

22 MR. MOORE: I also want to close too
23 that we in the last part of our comment, we
24 touch on there's a provision that basically

1 after, and again just as we read it, that after
2 six years almost the certification process would
3 have to occur again for devices and software
4 components within the state.

5 And I think we just point out that
6 that six-year timeframe is a situation where
7 it's basically less than six years on Thursday
8 and then it's six years on Friday, basically
9 nothing has changed except the time involved.
10 I'm not necessarily sure that setting a
11 timeframe for when the certification sort of
12 lapses to where it would basically have to
13 reboot through that entire process again is
14 necessarily something that is supported by
15 science and data.

16 There's really no other jurisdiction
17 who currently holds that type of requirement.
18 To where again you could have something in the
19 field today that tomorrow comes and it's six
20 years and now it has to go back through a
21 recertification process. Obviously, it'd be
22 very costly.

23 I see from a risk standpoint, sure.
24 And as a laboratory, we would love to have to

1 revisit things every six years just because.
2 But I don't think that there's necessarily a lot
3 of validity specifically in that requirement.

4 MR. MULLALLY: And the next is
5 144.06, paragraph seven, subparagraph (b) where
6 it requires the laboratory to on a monthly basis
7 provide the Commission with detailed billing
8 records.

9 And while we certainly have no
10 objection at all to the Commission having access
11 to our billing records whenever they want it and
12 visibility to anything with regard to our
13 billing and any interaction we have with any
14 manufacturer at any time, based on our
15 experience, we wonder whether this isn't a
16 paperwork requirement that would have over time
17 limited value.

18 CHAIRMAN CROSBY: I'm sorry. This
19 is 144.06?

20 MR. MULLALLY: Paragraph seven,
21 subparagraph (b), (7)(b).

22 CHAIRMAN CROSBY: Continuing
23 obligations, all testing shall be performed by a
24 person?

1 MR. MULLALLY: This is the one that
2 says the certified independent testing
3 laboratory shall provide the Commission each
4 month with a list and description of all the
5 amounts paid by or invoiced to the licensing
6 gaming vendors.

7 CHAIRMAN CROSBY: It's probably my
8 mistake here. 144.06, paragraph which?

9 MR. MULLALLY: Seven.

10 CHAIRMAN CROSBY: That's continuing
11 obligations.

12 MR. MULLALLY: Then there's a
13 subparagraph (b).

14 CHAIRMAN CROSBY: Yes, all testing
15 shall be performed by a person.

16 MR. MULLALLY: We must have
17 referenced it wrong. Todd, do you know? It's
18 the one about the monthly billing.

19 MR. GLENNON: The certified
20 independent testing laboratory shall provide the
21 Commission each month with a list and
22 description of all amounts paid or invoiced to a
23 licensed gaming vendor for the cost of gaming
24 device testing or otherwise.

1 MR. MULLALLY: Is that 7(b)?

2 MR. GLENNON: We changed the
3 citation. So, we don't even have it right. But
4 the language is as we read it and we've modified
5 that.

6 CHAIRMAN CROSBY: So, I don't have
7 that here. That's why I can't find it.

8 MR. MULLALLY: So, anyway, we have
9 no objection to any of that. We thought maybe
10 quarterly, biannually or whenever you want. Or
11 we're open to review. Whenever you want to
12 conduct an audit, just tell us what you want and
13 we send it to you rather than sending it every
14 month. It's a fairly significant amount of
15 data.

16 And we just wondered whether on a
17 monthly -- I remember when I was a regulator
18 once I inadvertently walked into a filing room.
19 And there was somebody in there. And I said
20 what are all of these? And they said this is
21 every contract over \$50,000 for all of the
22 casinos. I said really? And it was filing
23 cabinet, filing cabinet, filing cabinet. I said
24 to the director of records, how often does

1 anybody come in here and look at these? Maybe
2 once a month or every other month.

3 We've changed that rule so to make
4 it available upon request rather than have
5 filing cabinets filled with documents that
6 weren't being accessed.

7 CHAIRMAN CROSBY: Yes. We are
8 thinking thoughts like that on a lot of issues.

9 MR. MULLALLY: And then the final
10 comment I think we have is 144 and what we have
11 is .06 paragraph 7(c) that talks about the lab
12 implementing a hiring and background check
13 process that ensures at a minimum, no person --
14 It talks about who we hire that has failed to
15 disclose or misstated information or otherwise
16 attempted to mislead the Commission with respect
17 to any information the person has provided to
18 the Commission, or who has committed prior acts
19 which have not been prosecuted or in which the
20 person was not convicted to form a pattern of
21 misconduct that makes the person suitable.

22 Our only concern here is that we
23 will certainly employ a due diligence process
24 that we think will meet the highest standard. I

1 don't know that any process we could ever
2 envision could determine whether somebody had
3 failed to disclose or misstated information to
4 the Commission, because if they did it to you,
5 they probably did it to us.

6 So, I don't know how we can certify
7 that. What we would prefer is that we have
8 language that says that we institute a due
9 diligence program for checking our prospective
10 employees that has been approved by the
11 Commission. And therefore, as long as we follow
12 the procedures that you have approved where
13 we're checking out our own employees to the best
14 of our ability.

15 For instance, in most states, I'm
16 not licensed to practice law in the
17 Commonwealth, but in most states if you have a
18 suspended imposition of sentence where sentence
19 was never imposed that's actually not
20 technically a conviction under the law and is
21 therefore a closed record. So, we could have an
22 SIS and the person could fail to disclose it to
23 us. And even with our records check, we would
24 have no way of knowing that that offense had

1 ever been committed.

2 You would, because your
3 investigators I presume have access to closed
4 records, but the private lab would not. So, we
5 will do whatever you want here. We're just
6 pointing out we would find meeting that standard
7 incredibly difficult.

8 And Mr. Chairman, members of the
9 staff that concludes our remarks and we hope
10 they've been helpful.

11 CHAIRMAN CROSBY: Yes, very
12 interesting thank you. This is not the time to
13 do it, but we'll think about this and I'm sure
14 iterative back and forth with you if there are
15 other need for clarification or discussion.
16 Great.

17 MR. MOORE: Thank you.

18 MR. MULLALLY: Thank you very much.

19 CHAIRMAN CROSBY: Thank you. Are
20 there other people who wish to speak? Everybody
21 else is here just to listen.

22 It's 1:30. So, I think it's
23 probably safe to say that this is the only live
24 testimony we're going to have. As I said, we've

1 got other testimony, other submissions. Are
2 they -- Are the other comments posted? I guess
3 they aren't all, right?

4 MR. GLENNON: The comments will be
5 posted prior to the Commission meeting.

6 CHAIRMAN CROSBY: Not before that,
7 okay. I guess we should adjourn. People should
8 have been here at 1:00 if they wanted to speak.
9 So, thank you all for coming to join us. Sorry
10 we didn't have more entertainment for you.

11

12 (Hearing adjourned at 1:30 p.m.)

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1 GUEST SPEAKERS:

2 Mike Medlin, Novomatic America

3 Patrick Moore, Gaming Laboratories International

4 Kevin Mullally, Gaming Laboratories International

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6 MASSACHUSETTS GAMING STAFF:

7 John Glennon, Chief Information Officer

8 Todd Grossman, Deputy General Counsel

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C E R T I F I C A T E

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I, Laurie J. Jordan, an Approved Court Reporter,
do hereby certify that the foregoing is a true
and accurate transcript from the record of the
proceedings.

I, Laurie J. Jordan, further certify that the
foregoing is in compliance with the
Administrative Office of the Trial Court
Directive on Transcript Format.

I, Laurie J. Jordan, further certify I neither
am counsel for, related to, nor employed by any
of the parties to the action in which this
hearing was taken and further that I am not
financially nor otherwise interested in the
outcome of this action.

Proceedings recorded by Verbatim means, and
transcript produced from computer.

WITNESS MY HAND this 18th day of June,
2014.

LAURIE J. JORDAN My Commission expires:
Notary Public May 11, 2018