

December 12, 2025

Executive Secretary
Nevada Gaming Control Board
1919 College Parkway
Carson City, NV 89706
Email: regcomments@gcb.nv.gov

RE: Comments on Proposed Amendments to Regulation 14 and Technical Standards for Gaming Devices and Associated Equipment (Notice #2025-101)

Dear Executive Secretary,

On behalf of BMM Testlabs, we appreciate the opportunity to provide comments regarding the proposed amendments to Nevada Gaming Commission Regulation 14 and the Technical Standards for Gaming Devices and Associated Equipment, as outlined in Notice #2025-101.

Regulation 14 Draft 11/06/2025

14.260 Approval of associated equipment; application and procedures

14.260(2)

The proposed language requires associated equipment to comply with internal control requirements we respectfully recommend that the reference to sections 6.090 and 6.100 be removed from Regulation 14.260(2) draft language. Associated equipment approval should be based solely on compliance with equipment specific regulations or technical standards. Any technical capabilities that associated equipment must possess to support licensee compliance with internal controls should be incorporated into the technical standards adopted pursuant to section 14.050, not referenced as operational requirements in the equipment approval criteria. Including into the operational requirements creates confusion as to what is the responsibility of associated equipment versus operational procedures.

If the current language is retained, it should be clarified that sections 6.090 and 6.100 address minimum internal controls for Group I and Group II licensees, both of which apply to nonrestricted licensees. While a waiver provision exists that may apply to equipment intended for restricted locations, we respectfully recommend clarifying that these requirements apply only when the equipment is intended for use in nonrestricted locations.

The Chair shall not grant an application for approval of associated equipment unless the associated equipment complies with all applicable requirements and standards set forth in the

*Nevada Gaming Control Act, these regulations, the technical standards adopted pursuant to section 14.050, **and, where the equipment is intended for use by Group I or Group II nonrestricted licensees**, the minimum internal controls adopted pursuant to section 6.090 of these regulations **and** internal control procedures adopted pursuant to section 6.100 of these regulations **applicable to such licensees**, and any waiver or modification thereof granted by the Chair.*

14.260(8)

This new language allows the Chair to waive requirements of the technical standards that apply to associated equipment. Given that associated equipment approval will not be granted unless it complies with not only technical standards but also the minimum internal controls (MICs) and minimum internal control procedures (ICPs), we would respectfully suggest that this provision be expanded to include the Chair's authority to waive the requirement of the MICs or ICPs as well should this language remain Regulation 14.260(2)

We would request that the Board provide all registered ITL's notification of any such waivers being granted to ensure testing consistency with similar or like products.

Technical Standards for Gaming Devices and Associated Equipment Draft 12/02/2025

1.020 Safety and electrical interference immunity.

The proposed standard requires EGDs to withstand 27,000-volt electrostatic discharge, which is 3.4 times higher than the generally accepted standard IEC standard ($\pm 8\text{kV}$ per IEC 61000-4-2 Level 3) and 1.8 times higher than severe industrial environments (IEC Level 4: $\pm 15\text{kV}$).

We respectfully request clarification if the OSHA NRTL "equivalent requirements" provision in 1.020(2)(b) means that IEC 61000-4-2 Level 3/4 certification satisfies Nevada's requirement? If so, this would align Nevada with international standards but would create a disparity between the current 27kV requirement in Nevada.

We appreciate the Board's efforts to modernize and standardize these regulations and technical standards. Thank you for considering our comments. Please feel free to contact me at travis.foley@bmm.com should you require further clarification.

Sincerely,



Travis Foley

Chief Government and Regulatory Officer
BMM Testlabs