



GBG Machines Group

12 February 2025

Initial comments on the Commission's Gaming Machine Technical Standards consultation

The list of attendees is in Appendix A

Limits & Staff Alerts

- Big concerns about the lack of clarity on how staff alerts will communicate with central systems on an industry wide level.
- No centralised protocol for machines to systems (for limits).
- Also need a protocol for system to notification system (ie to tablets)
- No other data protocols.
- Timescales of 6 months (from when final decision published) to agree protocol and manufacturers to implement is an unreasonable timeframe.
- Do the systems have to record the interactions as well? (which strays into the compliance arena).
- How long do you have to keep the alerts at local level on machines?

Systems

- Some manufacturers have proprietary systems (and protocols), others don't
- Some systems will be able to do more than others (eg if system is server based it can meet the GC proposals, where as a non-server-based system cannot)
- Concern that one system could overcommit something to GC which other systems couldn't deliver.
- Assurances given by one systems provider that they would not say anything to the GC until the GBG protocols are in place.
- All want to be on the same page and ensure that timescales are not pushed.
- For example BACTA protocol would not be able to extract data in the required format.
- An operator that runs on the minimal implementation of EDC will have to somehow respond in real time to the alerts. The information cannot all just sit in a box, it needs to be able to communicate with the centralised system.

Training for staff about what to do with the alerts

- Operational overheads of staff time (eg 20 customers = 60 alerts/hour if they choose the default limits).
- If you have 1000s of alerts/day there is a risk that it will become white noise and you could miss the real alert where you need to take action and protect the player.
- Noted that many players get to 20 mins with very little lost or won.

What is a new machine?

- Is it the point of manufacture of the cabinet?
- Is it when its built or when it leaves the factory?
- Of is it when new software installed?
- What if you bought a machine a few months ago and its been in storage waiting to be used/ for an upgrade?
- What about a second-hand machine, which has had content added and sold to a new party?

Actions:

- **MG** to URGENTLY set up meeting of the system providers
- **MG/GBG** to look into the GBG protocol listing on dropbox and website

APPENDIX A

LIST OF ATTENDEES

First Name	Last Name	Company
Peter	Fagg	Boomerang Digital
Ian	Fuller	Boomerang Digital
Chris	Wrigley	Boomerang Digital
James	Armstrong	Boomerang Digital
Adam	Jaunbocus	Bpops
Heidi	Hards	Buzz Bingo
Simon	Barff	CLMS
Tony	Lister	Cowells Arrow
Andrea	Rushworth	Crown Direct
Matthew	Stadius	Entain
Jonathan	Sanders	Evoke Plc
Graham	Glanfield	Game Nation
Amanda	Fry	GBG
Charlotte	Meller	GBG
Steve	Sharp	GBG
Mark	Edmundson	GeWeTe
Thomas	Trabi	IGT
Alina	Burlakova	IGT
Andy	Bullock	Innovative Technology
Chris	Bower	ITL
Evgeny	Shulyak	JCM Global
Anthony	Denby	Leisure Electronics
Lee	Morton	Light & Wonder
Paul	Weston	Link4Pay
Mark	Gibson	Luxury Leisure
Paul	Monkman	Luxury Leisure
Chris	Packer	Luxury Leisure
Nigel	Davis	Merkur
Jorg	Gartner	Merkur
Shakila	Neill	Moto
Nigel	Kelly	Novomatic
Rob	Bennett	Novomatic
Vince	Bateson	Paddy Power