



COMMENTS OF INTERNATIONAL GAME TECHNOLOGY (IGT)
To Proposed Amendments to Bank Secrecy Act Regulations
71 Fed. Reg. 14129 (March 21, 2006)
RIN 1506-AA84

IGT is the world leader in the design, production, programming, installation, service and operation of gaming machines and gaming machine systems. The Company currently is the largest supplier of gaming machines in North America with roughly a 68% market share. As the major supplier of gaming machines in the United States today, we are committed to providing our customers with the technology necessary to comply with the "Casino Recordkeeping and Reporting Requirements" under the Bank Secrecy Act, and therefore, in general we endorse and support the regulatory amendments currently being proposed by the Financial Crimes Enforcement Network (FinCEN).

However, there is one proposed amendment regarding the tracking of bills inserted into gaming machines, C3. Bills inserted into electronic gaming devices - 103.22(b)(2)(i)(I), which IGT feels obligated to comment on from a technology perspective. We feel the comments provided below should be taken into consideration in so far as how FinCEN will choose to continue to apply the "knowledge" standard for casinos relative to the insertion of bills into gaming machines, and the new paragraph FinCEN proposes to add to this rule.

Currently, a casino's "knowledge" of who is inserting how much currency in its gaming machines in a 24 hour period is limited by the fact that:

- Not everyone playing the gaming machines in a casino actually belong to that casino's player rewards program, which attempts to identify and track players through a player's club card.
- There is nothing that requires someone to be a member of a players' club to play a gaming machine.
- Even members of players' clubs will go unidentified if they fail to insert their player's club card in the gaming machine.
- There is currently no technology in place that confirms that the person inserting the player's club card is actually the person enrolled in that casino's player rewards program.
- There currently is no technology in place that links a casino's slot accounting system, in real time, with its player rewards (tracking) system.

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It is this last point regarding technological capabilities that we feel IGT must share the benefit of its knowledge and experience. We currently estimate it would take several man years of development time to interface our current state of the art casino management system with each casinos player rewards program for the purpose of tracking all cash inserted into a gaming machine by a player who happens to have his player tracking card inserted in the machine. This development task is complicated by the following:

- There are several different proprietary casino player rewards programs in use today. This then would require separate development for each of the programs in order for our slot accounting system to work.
- Casinos operate a variety of gaming machines from a number of different manufacturers. This would require the development and distribution of a standard protocol with each manufacturer then being left to make the necessary software and possibly hardware changes to allow the machines to operate on the system.
- Each gaming jurisdiction around the country has its own approval procedures for any system and/or gaming machine changes. So on top of the development time required for these changes, the required regulatory approvals could easily add a year to the implementation process.

Over and above these basic hurdles, the technical task is further complicated by the fact that there are several highly technical and extremely complicated issues that may have to be incorporated into this development effort.

In summary, IGT respectfully submits that our current system technology does not allow us to provide the information required by your proposed rule and the cost in terms of dollars and the time to develop and implement that technology is significant and to a great degree undefined at this time. The effort cannot be predicted with sufficient precision to make a reliable dollar estimate due to the variations amongst the systems. Therefore, we feel that the current application of the "knowledge" standard to currency inserted into gaming machines through bill acceptors is still operational and that it has in no way changed due to any technological developments that we are aware of or that IGT is currently committed to develop due to the extensive cost and related issues.

Respectfully submitted,

A handwritten signature in cursive script, reading "Audrey Damonte", is written over the typed name.

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