

Stakeholder/Public Comment for JCAR Agency Report: *Internet Sports Betting*

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Name/Org	Comments Public Hearing/ Written	LSBA LIGA	Rule	Comment	Change/no change	Agency rationale
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.711(c)	Definition of “Affiliate marketer”: Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.711(c)	The current definition of “affiliate marketer” is very broad. Change to: “Affiliate marketer” means entities and individuals involved in promoting, marketing, and directing business to online gaming sites, on their own behalf, and who have an agreement to be compensated by a sports betting or internet gaming operator licensee based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross revenue.”	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)
Bob DeVries, Governmental Consultant Services Inc., on behalf of NBA- MLB-PGA Tour (Leagues)	Written	LSBA	432.711(c)	Insert language to clarify and limit scope of who is considered an affiliate marketer. Change language to: “Affiliate marketer” means entities and individuals whose core business function involves promoting, marketing, and directing business to online gaming sites. This term shall not apply to entities not	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)

				primarily in the business of promoting, marketing and directing business to online gaming sites.		
Bob DeVries, Governmental Consultant Services Inc., on behalf of NBA-MLB-PGA Tour	Written	LSBA	432.711(c)	Propose changing definition: "Affiliate marketer" means a person or entity involved in whose primary business (unction is promoting, marketing, and directing business to online gaming site." Alternatively, we recommend amending the Affiliate Marketer definition to expressly exempt sports governing bodies, in light of the fact that the Michigan Legislature specifically considered the leagues' role in the sports betting market in designing the requirements relating to official league data.	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)
Trevor Hayes, William Hill	Written	LSBA	432.711(m)	In definition of "Key person" we respectfully request a revised definition of "key person" to only capture those employees with direct oversight or control of operations in Michigan, including a clearer definition of the word "director" as used in (i) and (vi).	No change	The definition aligns with statutory language
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.711(p)	Definition of "Prohibited person": Employee participation/risk	Change	Definition changed to no longer prohibit person licensed under Gaming Control and Revenue Act or the Indian Gaming Regulatory Act from creating accounts or placing wagers. Added a new (v), as this is not currently in the draft.

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Andrea Hansen on behalf of FanDuel	Written	LSBA	432.711(p)	Definition of "Prohibited person": The highlighted sections should not be in the definition of prohibited person. A prohibited person is not allowed to set up an account. These individuals are allowed to set up an account they just cannot place wagers on certain events. We would suggest that these sections be put in a separate rule on conduct that is prohibited, similar to how it is done in the Gaming Act Rules.	No change	Resolved with the amendment to R 432.775(1), R 432.776(1) and R 432.751a(2)
Seth Young, PointsBet	Written	LSBA	432.711(p)	Definition of "Prohibited person": does this prohibit an employee of an operator's casino from wagering with the operator's platform provider?	Change	Definition changed to no longer prohibits person licensed under Gaming Control and Revenue Act or the Indian Gaming Regulatory Act from creating accounts or placing wagers.
Seth Young, PointsBet	Written	LSBA	432.711(q)	Definition of "Publicly traded corporation": Is the Board going to recognize a publicly traded corporation on the ASX for purposes of the requirements of the rules?	No change	The Board relies on reporting to the US Securities and Exchange Commission
Seth Young, PointsBet	Written	LSBA	432.711(x)	Definition of "Targeted mailing": Would this prohibit cross-selling customers from a sports betting platform to a casino?	No change	R 432.774 prohibits targeted mailing to persons on the self-exclusion list
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.711	Add definition of ex parte communication	No change	Limits Board discretion
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.721a	Proposed adding "operator" along with "platform provider"	No change	Covered in R 432.721
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.721f(2) - (3)	Suggests language is duplicative of other subrules	No change	Unnecessary

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Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LSBA	432.721k(2)	Not all vendors will have an actual representative in Michigan to receive services and other persons required to be licensed likely will have no presence in the state	Change	Removed "within Michigan."
Robert Russel, RMC, on behalf of DraftKings	Written	LSBA	432.722	clarity relating to sports betting "data providers" and "provider hosting live sports betting data"; Would like additional clarification which providers fall into these categories and which are not included.	No change	MGCB provided verbal verification
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.722	Replace "regarding" with "directly impacting"	No change	Contrary to the definition of supplier MCL 432.403(ee)
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.722(3)(f)	Definition of "Affiliate marketer": Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.723(11)(c)	Occ. Licensing: Reciprocity provision was removed, request it be added back in	Change	Board added language allowing exemption from occupational licensing if licensed by governmental entity. Can still require registration
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.723(2)	Encompassing too large group of employees; add "deployment of code to production of"	Change	Board identified persons having direct impact on integrity of gaming
Robert Russel, RMC, on behalf of DraftKings	Written	LSBA	432.723(2)	Suggest including "deployment of code" language to limit who is included in occupational licensing.	Change	Board identified persons having direct impact on integrity of gaming

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Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.723(1)	Subpart (1) could be overly burdensome	No change	There is a mechanism in place for a sports betting operator or sports betting supplier to provide an explanation, such as a job description, to support an allegation that a position should not require an occupational license.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.723(2)	Limit scope of occupation licensing only to individuals that make changes to hardware or software having ability to affect the outcome of a game	Change	Board identified persons having direct impact on integrity of gaming
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.723(2)	Limit the scope of who is required to be licensed	Change	Board identified persons having direct impact on integrity of gaming
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.723(2)(a) and (b)	Encompassing too large group of employees; add “deployment of code to production of”	Change	Board identified persons having direct impact on integrity of gaming
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.723(2)(c)	Vague and unclear	Change	Removed 723(2)(c) and (d)
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.724	Asking for clarification that employers are permitted to pay occupational licensing fees on behalf of their employees	No change	Operators or platform providers <i>can</i> pay occupational license fees
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.724(3)(c)	Occupational license application fee is extremely high given there is only one level.	Change	Board lowered application fee from \$500 to \$250.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.724(8)	Occupational license should be payable every two years concurrent with the renewal	Change	(7) Strike “each year” (a) add “annual fee” (b) add “annual fee” (c) add “biennial fee”
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.725b(3)	Supplier licensing: The contingent rule regarding whether a supplier qualifies as “an arm of the tribe” should only apply	Change	Language was added to clarify that relevant legal criteria under federal Indian law will be used to

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				if the tribe who is in a relationship with the supplier claims that the supplier is an arm of the tribe. The determination of whether the supplier qualifies as an “arm of the tribe” should be based on objective criteria informed by proper analysis of federal Indian law. See, e.g., People v. Miami Nation Enterprises, 386 P.3d 357 (2016)		establish arm of tribe status.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.729(1)(a)	Inserted “internet” before “sports betting platform provider”	Change	Omission in the original draft
	Written	LSBA	432.729(1)(a)(i)	Definition of “Affiliate marketer”: Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.722(3)(f) and 432.729(1)(a)(i)
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.729(1)(a)(iv)	Inserted “internet” before “sports betting platform provider”	Change	Omission in the original draft
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.729(1)(a)(iv)	Add “that directly affects internet sports betting” Change “in a” to “during the prior” calendar year	No change No change	If the business “directly affects internet sports betting”, it is likely a supplier, not a vendor The registration should be obtained when the vendor crosses the \$100,000 threshold.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.729(1)(a)(iv)	Suggest deleting (1)(a)(iv) and limiting (1)(a)(vi) to other persons who provide more than \$100,000 worth of goods and/or services in a calendar year that are specifically related to the operation sports	No Change	If the goods and/or services are specifically related to sports betting, the person is likely to be a supplier not a vendor. Board needs

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				betting as deemed necessary by the board.		authority to determine other persons that require vendor registration.
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.729(1)(a)(v)	“Data Warehouses” may not be the best term -- “Data Centers” seems more accurate.	Change	“Data Center” is a more appropriate term
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.731(1)	Change “and” to “and/or”	No change	Servers must be located within this state
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.732a	Limit source code to those deemed to be a critical component	No change	Lab needs source code for any component, not just critical components
Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LSBA	432.732a(2)	What is a Gaming Authentication Tool	No change	Term is commonly referred to and known in the industry as GAT. Point of rules is “software must be designed with a method to permit the validation of software.
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.732a(3)	Submitting source code to any entity, even a third-party testing laboratory, could become a security breach to any operator or supplier’s platform and open up the platform to unnecessary risk. We respectfully suggest the following substitute language, “The internet gaming platform provider or internet gaming supplier shall verify the hashes of critical components.”	No change	Board needs source code to evaluate the submission and ensure the submitted software is what was approved
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.732a(7)	Provide automatic approval for software updates to reduce unnecessary delays and increased regulatory costs.	No change	Handling of software updates is sufficiently addressed under the self-monitoring of gaming platform critical components and change

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						approval requirements of the administrative rules.
MGCB	Written	LSBA	432.732b(1)	Change “and” to “or”	Change	Change “and” to “or, or both” to make less burdensome
Lloyd D. Levenson (Cooper Levenson)	Written	LSBA	432.734(1)	We are in favor of Rules being put in place that will allow multi-state poker agreements should the legislature pass such a bill authorizing same.	Change	As a result of the change to R 432.634, a change is made to R 432.734 for consistency purposes
Andrea Hansen on behalf of Kambi	Written	LSBA	432.734	Can odds-making components be made outside of the US?	No change	Technical bulletins provide clarification
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.735(4)	Change “and” to “or”	Change	Change “and” to “or, or both” to make less burdensome
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.736(4)	Change “and” to “or”	Change	Change “and” to “or, or both” to make less burdensome
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.737a	Change “and” to “or”	No change	Must be done jointly
Mike Phelan, Pokagon Gaming Authority	Written	LSBA	432.739	In order to avoid confusion and possible conflict, this provision should be coordinated with (or, possibly, combined with) 432.634(1), which addresses substantially the same subject matter.	No change	432.734(1) addresses wagering components only (which must be located in Michigan), while this provision addresses all critical components. Some components will be subject to both requirements, while certain non-wagering components will only be subject to this provision.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.739(1)	Change “and” to “and/or”	Change	Change to “or, or both” to make less burdensome

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Andrea Hansen on behalf of FanDuel	Written	LSBA	432.739(2)(c)	Version 2 of Standard GLI-19 should be “version 3”	Change	With GLI-19 change from version 2 to version 3, it is necessary for consistency purposes to add section (2)(c)(vi)
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.739(3)	Change “and” to “or”	Change	Change “and” to “or, or both” to make less burdensome
Seth Young, PointsBet	Written	LSBA	432.743(12)	(integrity monitoring) Recommend tightening this up. If we think there’s an issue, we will notify the integrity monitor/the Board, but it should be the job of the Board/integrity monitor to disseminate these notifications	Change	Clarified to now provide: “An internet sports betting platform provider must promptly notify any affected sports betting operators on behalf of which it accepts internet sports betting wagers of any issues impacting the integrity of internet sports betting.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.741(7)	Add “Any such decision by the Board may be appealed under the Administrative Procedures Act, 1969 PA 306, MCL 24.201 to 24.328.”	No change	Not provided for in the APA
Seth Young, PointsBet	Written	LIGA	R 432.745	Request authorizing fixed odds horse racing wagering	No change	A request for authorization can be submitted to the Board via the events category and wager type approval process
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.745(2)	Propose removing the requirement of test or experimental test periods for event categories and wager types	No change	Test or experimental period not required for all event categories or wager types and will not result in operational inefficiencies

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Monique Field-Foster, Warner Norcross + Judd LLP, on behalf of National Football League	Written	LSBA	432.745(7)(e)	Insert “on the decisions of game officials” to any wager on the injury of a participant in an event	No change	The proposed insertion is too broad. In addition, any sports- governing body has a mechanism to submit a request to the Board to prohibit wagering on a particular wager type.
Seth Young, PointsBet	Written	LSBA	432.745(9)	Are there punitive measures for intentionally offering an unauthorized or prohibited event?	No change	The Board has discretion to take disciplinary action up to an including license revocation.
Seth Young, PointsBet	Written	LSBA	432.745(10)	What are the standards for determining if the outcome is publicly known?	No change	This is meant to allow wagering on an event approved by the Board when the outcome is known to select individuals before it is publicly announced
Monique Field-Foster, Warner Norcross + Judd LLP, on behalf of National Football League	Written	LSBA	432.745(12)(c)	Change “is necessary” to “would reasonably”	No change	“is necessary” is the language used in MCL 432.410(4)
Monique Field-Foster, Warner Norcross + Judd LLP, on behalf of National Football League	Written	LSBA	432.745(15)	Change “is necessary” to “would reasonably”	No change	“is necessary” is the language used in MCL 432.410(4)
Monique Field-Foster, Warner Norcross + Judd LLP, on behalf of National Football League	Written	LSBA	432.746 Sections (2)(a)(iv) and (v), (3)(a), (6)(d)(i)	Proposed insertion: “To the fullest extent permitted under applicable law, all information submitted to the Board relating to the terms on which official league data is offered, and the processes by which such data is compiled and distributed, will be	No change	Contrary to the intent of the Freedom of Information Act MCL 15.231-15.246

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				maintained by the Board in confidence.”		
Robert Russel, RMC, on behalf of SportRadar and DraftKings	Written	LSBA	432.746(1)(a)(iii)	Suggestion to strike 746(1)(a)(iii) “The method of data collection must not violate any applicable terms of admittance to an event or terms of service of a website.” While we need appropriate safeguards, these should be balanced to avoid creating undue market restrictions. This restriction on the data collection would be unique to Michigan and not in any other state or international jurisdiction. The Rule suggests that using publicly available schedules for offering betting markets or confirming final scores of a sporting event to payout tier 1 or tier 2 sports bets may be a violation of Rule 746.	Change	Board struck language as suggested.
Robert Russel, RNC, on behalf of SportRadar	Written	LSBA	432.746(1)	Our recommendation is to make 3 modest adjustments to the conditions imposed by Rule 746 as follows: a) Conditions on data collection activity to be limited to collection occurring within the jurisdiction of Michigan; b) Conditions on data collection activity relating to US-based sports to be limited to those who make available official league data on commercially reasonable terms and whose governing bodies have notified the MGCB for the purposes of using official league data in Michigan, and;	Change	Board struck R 432.746(1)(a)(iii)

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				c) Conditions on collection or distribution of data to be limited to live data associated with offering tier 2 sports bets.		
Robert Russel, RNC, on behalf of SportRadar	Written	LSBA	432.746(1)(a)(iii)	Suggest striking (iii) or replacing with "For sports taking place in the United States where the sports governing body has made official league data available on commercially reasonable terms in the state of Michigan, the method of data collection must comply with any applicable terms of admittance to an event or terms of service of a website."	Change	Board struck language as suggested.
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.746(1)(a)(iii)	Suggest striking (iii) or replacing with "For sports taking place in the United States where the sports governing body has made official league data available on commercially reasonable terms in the state of Michigan, the method of data collection must comply with any applicable terms of admittance to an event or terms of service of a website."	Change	Board struck language
Andrew Winchell, FanDuel	Written	LSBA	432.746(1)(a)(iii)	Suggest striking (iii) or replacing with "For sports taking place in the United States where the sports governing body has made official league data available on commercially reasonable terms in the state of Michigan, the method of data collection must comply with any applicable terms of admittance to an event or terms of service of a website."	Change	Board struck language as suggested

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Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.746(1)(a)(iii)	We respectfully request that the rule requiring “the method of collection must not violate any applicable terms of admittance to an event or terms of service of a website” to be removed. This rule prevents the use of public information (websites) from being used to settle a wager.	Change	Board struck language as suggested.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.746(1)(a)(iii)	Add: “This subsection does not apply if the data collection is collected pursuant to an agreement with the applicable sports governing body or is publicly available.”	No change	This rule doesn’t prevent what they propose
Bob DeVries, Governmental Consultant Services Inc., on behalf of NBA-MLB-PGA Tour (Leagues)	Written	LSBA	432.746(6)(g)(iv)	Insert “generally” before “complete...” and insert “based on industry standards for the relevant athletic events.”	Change	Accepted proposed changes with slight modification to provide clarity and guidance on how prescribed criteria will be evaluated.
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.746(2)(d)	Add “sports governing body headquartered in the United States”	No change	Already limited in (2)(a) to a sports governing body headquartered in the United States
Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LSBA	432.746a(7)	This needs to be subject to state/tribal/federal rules regarding KYC. For example, no payout if player refuses to provide identification.	Change	Add at beginning: Except as otherwise provided in these rules or applicable state or federal law.
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.751(1)(c)	Would like internet sports betting accounts and internet wagering accounts to interface from the participants perspective	Change	Board inserted language in a new 432.751(2) allowing integrated accounts with conditions
Robert Russel, Regulatory Management Counselors, PC	Written	LSBA	432.751(1)(c)	Authorize participants to be able to use same account for internet gaming and internet sports betting	Change	Board inserted language allowing integrated accounts with conditions

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Robert Russel, RMC, on behalf of GAN and DraftKings	Written	LSBA	432.751(1)(c)	Propose adding: "Notwithstanding the foregoing, the internet sports betting account may be integrated with an internet wagering account from the authorized participant's perspective allowing participants to have one account/sign-in that will provide access to both sports betting and (if applicable) internet gaming while still providing the accounting capability of separating sports betting and internet wagering upon request."	Change	Board inserted language allowing integrated accounts with conditions
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.751(1)(c)	Authorize participants to be able to use same account for internet gaming and internet sports betting	Change	Board inserted language allowing integrated accounts with conditions.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.751a(2)	Add "This subsection shall not be construed to prevent an individual from creating an internet sports betting account and depositing funds to such an account even if they are prohibited from certain placing certain wagers."	Change	A prohibited person may be able to make certain wagers
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.751a(3)	Change "demonstratable" to "demonstrable"	Change	Grammatical
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.751a(3)	Add "Such standards shall be satisfied by the use of a customer attestation that they are not a prohibited person at the time of account creation."	No change	Customer attestation may work in some cases but not others. Board retains discretion to determine if licensee has met this obligation
Trevor Hayes, William Hill	Written	LSBA	432.753(1)	We request further clarification on how we should comply with detecting unauthorized use of accounts	No change	The authorized participant information page must include information advising authorized participants

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						how to detect unauthorized use of their accounts
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.753(2)(c)	Remove “upon 24-hours-notice”; no specified period but “as required by the board”	No change	Authorized participant should be given opportunity to change their self-imposed limitations and Board retains authority to set a different period.
Robert Russel, RNC, on behalf of DraftKings	Written	LSBA	432.753(2)(c)	Remove “upon 24-hours-notice”; no specified period but “as required by the board”	No change	Authorized participant should be given opportunity to change their self-imposed limitations and Board retains authority to set a different period.
Kimberly Sutherland, LexisNexis Risk Solutions	Written	LSBA	432.751a	Provided recommendations for accuracy of data in identity authentication	No change	Identity verification addressed in the rules; specific procedures to be addressed in internal controls
Trevor Hayes, William Hill	Written	LSBA	432.755(a)(vii)	We respectfully request (vii) to be amended to allow for a mobile number to satisfy this requirement.	No change	A mobile number will satisfy this requirement
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.755c	Add: belonging to another authorized participant. This Rule does not prohibit an authorized participant from transferring funds between his or her own wagering accounts.	Change	Added to end: belonging to another authorized participant.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.755c	Propose inserting “belonging to another authorized participant”	Change	Clarifies it is intended to prevent one authorized participant from transferring funds to another authorized participant
Andrea Hansen, (Honigman LL)	Written	LSBA	432.755c	Insert “This Rule does not prohibit an authorized participant from	Change	Added to end: “belonging to another

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on behalf of Rhea Loney, Penn Interactive				transferring funds between his or her own wagering accounts.”		authorized participant” to clarify
Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LSBA	432.755d(1)	consider including concept that withdrawal may be delayed due to state/tribal/federal requirement and withdrawal is subject to player’s compliance with the same.	Change	Added at end: “or any other applicable state or federal law.
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.754	Request to approve a shorted responsible gaming message to be included on areas of the platform outside of the responsible gaming page	No change	Rule doesn’t require the message be displayed outside the responsible gaming page
Tammi Barlow, William Hill	Written	LSBA	432.754	Question on acceptable tagline	No change	Rules establish the responsible gambling message
Lachlan Hood, PointsBet	Written	LSBA	432.757	Suggests adding language to allow an operator to close an account at any time	No change	This rule only addresses authorized participant account closure
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.763(2)(a)	Request definition of “significant platform failure”	No change	Operator or platform provider can define this in their internal controls
Lachlan Hood, PointsBet	Written		R 432.772 and R 432.774	Asked whether self-exclusion can be applied across jurisdictions and channels	Change	Board struck language limiting use of information
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.772(4)	Propose striking this rule because it adds complexity and creates an unnecessary potential for confusion, and it is not “best practice” from a responsible gaming standpoint	Change	Board struck language limiting use of information
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.772(4)	Would like to exclude an excluded individual across all properties and platforms	Change	Board struck language limiting use of information

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Tammi Barlow, William Hill	Written	LSBA	R 432.774	Does operator need to maintain a self-exclusion list?	No change	Yes, the statute requires the operator to maintain a self-exclusion list. MCL 432.412(5)
Andrea Hansen on behalf of FanDuel		LSBA	432.774(1)	Change “and” to “or its”	No change	They only need one exclusion list
Tammi Barlow, William Hill	Written	LSBA	R 432.774(4)	Can someone self-exclude without first establishing an account?	Change	Any individual requesting placement in the self-exclusion list must submit through his or her internet wagering account or by another means authorized by the Board a completed request for self-exclusion.
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.774(7)	Propose striking this rule because it adds complexity and creates an unnecessary potential for confusion, and it is not “best practice” from a responsible gaming standpoint	Change	Board struck language limiting use of information
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LSBA	432.774(7)	“exclude one, exclude all”	Change	Board struck language limiting use of information
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.775(1)	Insert “knowingly” Add language referencing R 432.651a re: age and identity requirements	No change No change	board retains discretion on enforcement Not necessary
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.775(1)	Add “This subsection shall not be construed to prevent an individual from creating an internet gaming account and depositing funds to such an account even if they are prohibited from placing certain wagers.”	Change	A prohibited person may be able to make certain wagers

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Andrea Hansen on behalf of FanDuel	Written	LSBA	432.776(1)	Add language referencing R 432.651a re: age and identity requirements	No change	Not necessary
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.776(1)	Add "This subsection shall not be construed to prevent an individual from creating an internet gaming account and depositing funds to such an account even if they are prohibited from placing certain wagers."	Change	A prohibited person may be able to make certain wagers
Dalton Morgan	Written	LSBA		Urging the support of legalizing sports betting	No change	Authorized under Lawful Internet Sports Betting Act and Lawful Internet Gaming Act
Andrew J Bernal	Written	LSBA		I urge lawmakers to fast-track online betting to allow it within the next week	No change	Board must follow the guidelines in the Administrative Procedures Act (APA)

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