



STATE OF MICHIGAN  
**MICHIGAN GAMING CONTROL BOARD**  
DETROIT

**GRETCHEN WHITMER**  
GOVERNOR

**RICHARD S. KALM**  
EXECUTIVE DIRECTOR

**DATE:** September 3, 2020

**TO:** Internet gaming operators, sports betting operators, internet gaming platform providers, internet sports betting platform providers, and internet game suppliers

**CC:** GLI and BMM

**FROM:** Richard Kalm, Executive Director

**SUBJECT:** Internet Sports Betting/Internet Gaming Platform and Internet Game Submission

This memo applies to internet gaming conducted pursuant to the Lawful Internet Gaming Act (LIGA), 2019 PA 152, and proposed internet gaming rules and internet sports betting conducted pursuant to the Lawful Sports Betting Act (LSBA), 2019 PA 149, and proposed internet sports betting rules. Without limitation, the following are subject to this memo:

- Internet gaming operators and sports betting operators (operator or operators).
- Internet gaming platform providers and internet sports betting platform providers (platform provider or platform providers).
- Internet gaming platforms and internet sports betting platforms (platform or platforms).
- Internet gaming suppliers who provide internet games (supplier or suppliers).

Under the LIGA, LSBA, and proposed internet gaming and internet sports betting rules, all platforms and internet games, except as otherwise determined by the board in writing, must be tested and approved by the board prior to distribution to an operator.

Platform providers and suppliers must submit products that require approval to an approved independent test lab (ITL) for testing to Michigan's technical requirements. The ITL will provide the platform provider or supplier with the results of testing and a certification letter upon completion of its evaluation. The platform provider or supplier may then prepare a submission to the board using the internet sports betting or internet gaming software and hardware submission forms and related instructions available on the board's website at [https://www.michigan.gov/mgcb/0,4620,7-351-97573\\_99843-538743--,00.html](https://www.michigan.gov/mgcb/0,4620,7-351-97573_99843-538743--,00.html). Along with other submission requirements, platform providers and suppliers must include copies of the ITL test results and certification letters when submitting products to the board. Please note platform providers and suppliers should only submit to the board for approval those versions of products that have been certified (passed testing) by an ITL pursuant to the requirements of the LIGA or LSBA and proposed internet gaming or internet sports betting rules. The test results and certification letters, along with other submission information, will be taken into consideration by the board.

As of the date of this memo, Gaming Laboratories International (GLI) is the only ITL approved by the board for product testing of platforms and/or internet games. The board is in the process of reviewing BMM Test Lab testing procedures and hopes to reach a decision on the use of that laboratory in the next several weeks.

The board's acceptance of an ITL's test results and certification letters creates no relationship, contractual or otherwise, with the ITL and in no way guarantees approval of a platform or internet game.

Platform providers and suppliers are responsible for all costs associated with the testing and evaluation services performed by an ITL.

The board has developed draft technical bulletins providing additional guidance on the platform and internet game requirements contained primarily in Part 3 of the proposed internet gaming and internet sports betting rules. These technical bulletins have been posted to our website at [https://www.michigan.gov/mgcb/0,4620,7-351-97573\\_99843-536456--,00.html](https://www.michigan.gov/mgcb/0,4620,7-351-97573_99843-536456--,00.html) for your review and consideration. The technical bulletins will be updated to reflect any changes in the final rules.

In addition, under the LIGA, LSBA, and proposed internet gaming and internet sports betting rules, all operators and their platform providers must submit change control processes that detail evaluation procedures for all updates and changes to equipment and platforms to the board for review and approval. Please submit change control processes to David Hicks at [Hicksd8@michigan.gov](mailto:Hicksd8@michigan.gov).

As you are likely aware, the board asked each operator to submit its license application no later than July 31, 2020, and requested its prospective platform provider(s), suppliers, and vendors to submit their license or registration applications by August 14, 2020. In addition, each operator and each platform provider who will accept wagers on an operator's behalf were asked to submit their internal controls for internet gaming and/or internet sports betting (as applicable) for board review and approval by August 31, 2020.

If an operator has met the above application and internal control submission deadlines, we request that the operator work with its prospective platform provider(s) and all internet gaming suppliers to ensure its platform(s) and all internet games, respectively, are promptly submitted to an approved ITL for evaluation. This will allow the ITL to conduct testing prior to final approval of the internet gaming and internet sports betting rules. Platform providers and internet gaming suppliers should then prepare submissions and submit the platforms and internet games, as applicable, to the board for review and approval within 14 calendar days of the effective date of the final rules.

Additionally, operators and their platform providers should submit change control processes to the board for review and approval by September 25, 2020. GLI has published a change management program guide available at <https://gaminglabs.com/gli-standards/>

that operators and platform providers may find helpful in developing their change control processes.

Operators, platform providers, and internet gaming suppliers that continue to meet these deadlines will increase the likelihood of “going live” during the initial launch of internet sports betting and internet gaming in Michigan.

If you have any questions regarding this memo, please contact David Hicks at [hicksd8@michigan.gov](mailto:hicksd8@michigan.gov) or (517) 241-1659.