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GOVERNOR

STATE OF MICHIGAN
MICHIGAN GAMING CONTROL BOARD
DETROIT

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TECHNICAL BULLETIN
No. 2020-05

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

CC: GLI and BMM

FROM: Richard Kalm, Executive Director

SUBJECT: Technical specifications for data logging

For discussion purposes only - pending approval of final rules

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

- (1) Internet gaming operators and sports betting operators (operator or operators).
- (2) Internet gaming platform providers and internet sports betting platform providers (platform provider or platform providers).
- (3) Internet gaming platforms and internet sports betting platforms (platform or platforms).
- (4) Internet gaming suppliers and sports betting suppliers (supplier or suppliers).
- (5) Vendors registered under the LIGA and/or LSBA (vendor or vendors).
- (6) Internet wagers and internet sports betting wagers (wager or wagers).
- (7) Internet wagering accounts and internet sports betting accounts (account or accounts).

All platforms must employ a mechanism capable of maintaining a separate copy of all information the board requires to be logged on a separate and independent logging device capable of being administered by an employee with no incompatible function.

If the platform can be configured such that any logged data is contained in a secure transaction file, a separate logging device is not required.

Platform providers must meet or exceed all data logging standards prescribed by the board. Operators and platform providers must address all such requirements in the platform and internal controls which are submitted to the board for approval.

The platform must provide a mechanism for the board to query and export, in a format required by the board, all platform data related to internet gaming conducted under the LIGA or internet sports betting conducted under the LSBA.

Data logging standards prescribed by the board are as follows:

- (1) Account Creation Log: Platforms must log the date and time that any account is created or terminated in a secure electronic log.
- (2) Internet Gaming Activity Log/Internet Sports Betting Activity Log: Platforms must maintain all information necessary to recreate an individual's or authorized participant's wagering and account activity during each authorized participant session, including any identity or location verifications, for a period of no less than 5 years in a secure electronic log.
- (3) Software Installation/Removal Log: Unless otherwise authorized by the board, when software is installed on or removed from a platform, such action must be recorded in a secure electronic log. This log must include no less than the following:
 - (a) The date and time of the action.
 - (b) The identification of the software.
 - (c) The full identity and user ID of the person performing the action.
- (4) Game Availability Log (Internet Gaming Only): Unless otherwise authorized by the board, when a change in the availability of internet game software is made on an internet gaming platform, the change must be recorded in a secure electronic log including no less than the following:
 - (a) The date and time of the change.
 - (b) The identification of the software.
 - (c) The full identity and user ID of the person performing the change.
- (5) Promotions Log: Unless otherwise exempted by the board, a platform must record all bonus and promotional wagering offers issued through the platform in a secure electronic log. This log must provide the information necessary to audit compliance regarding the terms and conditions of current and previous offers.
- (6) Authentication Log: Results of all authentication attempts must be retained in a secure electronic log and accessible for no less than a period of 90 days.
- (7) Adjustments Log: All adjustments to a platform's data made using stored procedures must be recorded in a secure electronic log. This log must contain no less than the following:
 - (a) The date and time.
 - (b) The full identity and user ID of the person performing the action.
 - (c) A description of the event or action taken.
 - (d) The initial and ending values of any data altered as a part of the event or action performed.

(8) If a date and time is required in any log, the following format must be used:

(a) Date: mm/dd/yyyy.

(b) Time: hh:mm:ss.

The board reserves the right to reassess or clarify the standards established in this technical bulletin at any time in response to a legal interpretation, to include additional standards the board deems appropriate, to adjust to changes in technology, relevant standards, or platform design, or for any other reason necessary to regulate internet gaming under the LIGA or internet sports betting under the LSBA.

If you have any questions regarding this technical bulletin, please contact David Hicks at hicksd8@michigan.gov or (517) 241-1659.