



**GRETCHEN WHITMER**  
GOVERNOR

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

**RICHARD S. KALM**  
EXECUTIVE DIRECTOR

**TECHNICAL BULLETIN**  
**No. 2020-04**

**DATE:** August 6, 2020

**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:** External communication with individuals and authorized participants

***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).

Platforms authorized by the board must be designed to ensure the integrity and confidentiality of all individual and authorized participant communications and ensure the proper identification of the sender and receiver of all communications. If communications are performed across a public or third-party network, the platform must either encrypt the data packets or utilize a secure communications protocol to ensure the integrity and confidentiality of the transmission. Platform providers must meet or exceed all communication standards prescribed by the board. Platform providers and operators must address all communication requirements in the platform and internal controls which are submitted to the board for approval.

Communication standards prescribed by the board are as follows:

- (1) As used in this bulletin, the term client terminal means any device that is used by an individual or authorized participant to interact with a platform, including but not limited to a personal computer, mobile phone, or tablet. Unless otherwise indicated, the term does not include a device used by an employee of an operator, platform provider, supplier, vendor, or other third-party service provider to interact with a platform.
- (2) Wireless communications between a client terminal and a platform must be secured using robust wireless security and encryption protocols such as:
  - (a) IPsec.
  - (b) WPA2 or WPA3.
  - (c) AES.
  - (d) Any other method approved by the board.
- (3) An operator or platform provider must mask the service set identification (SSID) of the platform network to ensure that it is unavailable to the general public.
- (4) All communications that contain account numbers, user identification, passwords or personal identification numbers (PINs), individual or authorized participant data, sensitive information, wagers or results, financial information, or individual or authorized participant transaction information must utilize a secure method of transfer such as:
  - (a) 128-bit key or higher encryption.
  - (b) Any other method approved by the board.
- (5) Only devices authorized by the board are permitted to establish communications between a client terminal and a platform.
- (6) A platform must maintain an internal clock that reflects the current date and time that must be used to synchronize the time and date among all components that comprise the platform. The platform date and time must be visible to an individual or authorized participant when logged on.

Notwithstanding the minimum standards established in this technical bulletin, an operator or platform provider must employ reasonable efforts to ensure it meets or exceeds current industry-recognized communication standards, which may include, without limitation, timely replacement or upgrading of obsolete technology. The board reserves the right to reassess or clarify the standards established in this 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 internet sports betting 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](mailto:hicksd8@michigan.gov) or (517) 241-1659.