

CSI - Ohio

The Common Sense Initiative

Business Regulation Impact Analysis

Agency Name: Ohio Casino Control Commission ("Commission")

Regulation/Package Title: Gaming Equipment, Internal Controls, and Table Games

Rule Number(s): 3772-9-05 (Amended); 3772-9-12 (New); 3772-9-13 (New); 3772-10-05 (Amended); 3772-10-18 (Amended); 3772-10-28 (Amended); 3772-11-11 (Amended); 3772-11-13 (Amended); 3772-11-42 (Amended)

Date: _____

Rule Type:

☒ New

☒ Amended

☐ 5-Year Review
☐ Rescinded

The Common Sense Initiative was established by Executive Order 2011-01K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Regulatory Intent

1. Please briefly describe the draft regulation in plain language.

Please include the key provisions of the regulation as well as any proposed amendments.

The proposed rules contained within "Gaming Equipment, Internal Controls and Table Games" relate directly to the minimum internal controls standards that casino operators must

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employ while conducting casino gaming. These rules require adherence to and implementation of minimum internal controls to protect the integrity of casino gaming and casino patrons.

3772-10-18, 3772-10-28, 3772-11-11, 3772-11-13, and 3772-11-42 are proposed amended rules concerning minimum internal control standards that are designed to ensure the integrity of casino gaming and to protect casino patrons, while taking into consideration the needs and concerns of the regulated industry.

- **3772-10-18** decreases the regulatory requirement for locks on a bill validator canister from two locks to one lock. Both licensed casino operators in the state have been granted waivers from the Commission, allowing for the use of bill validator canisters with only one lock. Therefore, this rule reflects the current regulatory environment in Ohio.
- **3772-10-28** permits a casino operator to request discretionary approval from the Executive Director for amendments to internal controls requiring immediate action, lessening the preliminary notification requirement.
- **3772-11-11** simply changes the terminology from “marker” to “sign,” reflecting a more appropriate industry term.
- **3772-11-13** decreases the requirement for reserve chips, reducing the cost of compliance for the regulated industry.
- **3772-11-42** clarifies the existing rule concerning purchasing chips, reflecting the activities and procedures already approved by the Commission.

3772-9-05 amends the notification time requirement for transporting slot machines, reflecting the notification requirement for transporting other gaming-related equipment, including table games.

3772-9-12 requires gaming vendors to ensure their electronic gaming equipment supports a game authentication terminal (GAT) for gaming equipment verification.

3772-9-13 concerns minimum internal control standards and establishes a framework specific to redemption kiosks for compliance with the requirements. The requirements of this rule are already in place.

3772-10-05 requires the retention of records obtained from log entries in redemption kiosks.

2. Please list the Ohio statute authorizing the Agency to adopt this regulation.

- 3772-9-05, 3772-9-12, 3772-9-13, 3772-10-05, 3772-10-18, 3772-10-28, 3772-11-13, and 3772-11-42 → R.C. 3772.03 & 3772.033

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- 3772-11-11→ R.C. 3772.03

- 3. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?**

If yes, please briefly explain the source and substance of the federal requirement.

Not applicable.

- 4. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

This question does not apply to these proposed rules because the federal government does not regulate casino gaming in this state. Rather, casino gaming is permitted pursuant to Article XV, Section 6(C) of the Ohio Constitution and controlled by Ohio's Casino Control Act (i.e., Chapter 3772 of the Revised Code).

- 5. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?**

Article XV, Section 6(C) of the Ohio Constitution and Chapter 3772 of the Revised Code require the Commission to ensure the integrity of casino gaming and to prescribe rules for how casino gaming should be conducted (i.e., minimum internal control standards). In ensuring the integrity of casino gaming, it is imperative to protect casino patrons. These proposed rules are designed to effectuate this constitutional and statutory mandate by establishing minimum internal control standards for financial transactions occurring at the casino facilities, for the conducting of table games and slot machines, and for the protection of patrons and members of the public.

- 6. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?**

Overall, the Commission will measure the success of these proposed rules in terms of whether they help to ensure the integrity of casino gaming and protect the casino patrons. This can be done in two ways. First, through evaluating whether the administrative cost of implementing and enforcing the proposed rules outweighed their public benefit. Second, through analyzing the regulated community's comments about requests for waivers or variances from these rules once they are implemented.

Development of the Regulation

7. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

3771-09-05; 3772-09-13; 3772-10-05; 3772-10-18; 3772-10-28; 3772-11-11; 3772-11-13; 3772-11-42:

Casino Operators:

- Penn National Gaming
- Rock Ohio Caesars – joint venture between Rock Gaming and Caesars Entertainment

The above-listed stakeholders (casino operators) were initially contacted via email, with PDF document attachments of the proposed rules, on July 16, 2012, at 9:28 A.M. Notably, the stakeholders were permitted to review and comment on the rules before submission to the members of the Commission for consideration.

3772-09-12:

Casino Operators:

- Penn National Gaming
- Rock Ohio Caesars – joint venture between Rock Gaming and Caesars Entertainment

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Gaming-Related Vendors:

- Aristocrat Technologies, Inc.
- Bally Gaming, Inc. d/b/a Bally Technologies
- IGT
- Konami Gaming Inc.
- Spielo International (Ohio Gaming- Related Vendor License in Progress)
- WMS Gaming Inc.

The above listed stakeholders (gaming-related vendors) were contacted directly by telephone during the week of June 25th – 29th, 2012.

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8. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

3771-9-05; 3772-9-13; 3772-10-05; 3772-10-18; 3772-10-28; 3772-11-11; 3772-11-13;

3772-11-42: Both of the casino operators were afforded an opportunity to review drafts of these proposed rules before submission to the Commission. However, neither casino operator provided any input with respect to these rules.

3772-9-12: Several electronic gaming equipment vendors were contacted prior to finalizing the proposed GAT regulation to extend awareness and garner industry input. Only two Ohio licensed electronic gaming equipment vendors, IGT and WMS, had concerns with the proposed regulation. Their concerns regarded the manner and timeframe in which the currently used software would be prepared. Based on these concerns the proposed rule was revised. The rule's language now allows operators to use the current software until such a time as the software is revoked or the operator chooses to replace any of the critical program storage media.

IGT also expressed concern regarding the required 20 minute authentication time limit. Currently, all existing machines and gaming equipment in Ohio meet the 20 minute time limit. The Commission, however, acknowledges that in the future, larger gaming software programs may not be able to meet this requirement. Should this scenario arise, Ohio Adm. Code 3772-1-04 is in place, allowing gaming-related vendors to request variances and waivers. The Commission is amenable to granting waivers and variances on a case-by-case basis.

9. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

This question does not apply to these proposed rules because no scientific data was necessary to develop or measure their outcomes. Instead, the Commission staff reviewed how other jurisdictions (e.g. Colorado, Kansas, Indiana, Illinois, Maryland, Missouri, Nevada, New Jersey, and Pennsylvania) approached establishing minimum internal control standards. In so doing, the Commission staff was able to use, as much as possible, rules the regulated community is accustomed to, with minor adaptations to remain in compliance with Ohio law.

10. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

Because these proposed regulations are either designed to decrease the regulatory burden currently in place or constitute effective regulatory practices that the regulated community is accustomed to, the Commission did not specifically consider alternative regulations. Instead, as part of the drafting process, the Commission staff reviewed the rules adopted in several

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other jurisdictions – Colorado, Kansas, Indiana, Illinois, Maryland, Missouri, Nevada, New Jersey, and Pennsylvania. These rules are a conglomeration of the rules used by the other jurisdictions with adaptations made for the Ohio jurisdiction, and are in some cases, the result of discussions between Commission staff and the regulated community.

11. Did the Agency specifically consider a performance-based regulation? Please explain.

Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.

The rules include a performance-based component wherein they set the floor for compliance, but do not completely dictate how the casino operators are supposed to achieve compliance. In addition, Ohio Adm. Code 3772-1-04 allows the casino operators and gaming-related vendors to seek waivers and variances from these rules, which the Commission will evaluate on a case-by-case basis and may grant as long as it determines that doing so is in the public's best interest. The rules, however, are not entirely performance-based in that they establish a protocol whereby the casino operators must submit their internal control standards to the Commission for approval before implementation.

12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

This question does not apply to these proposed rules because no regulations in this area currently exist with respect to casino gaming in this state.

13. Please describe the Agency's plan for implementation of the regulation including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

At each casino facility, there are gaming agents and financial auditors observing, evaluating, and investigating the operations. In addition, the Commission's regulatory compliance personnel consistently visit the facilities to perform table game and electronic gaming equipment audits. Any issues that arise at any point in the gaming process (i.e., from manufacturing through the actual conducting of gaming) will be funneled to the Commission's central office in Columbus, Ohio, where the Executive Director and his division directors can coordinate a consistent response and conduct outreach to the regulated community.

Adverse Impact to Business

14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

- a. Identify the scope of the impacted business community;

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The casino operators and gaming-related vendors are the impacted business community with respect to these proposed rules.

b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and

Several of proposed rules contained within “Gaming Equipment, Internal Controls and Table Games” include amendments that will have a positive impact on businesses in Ohio. However, the nature of the potential adverse impact from the remaining amendments and rules include fines for noncompliance, costs for employer time and payroll, and the potential for other monetary costs to the operators.

c. Quantify the expected adverse impact from the regulation.

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.

3772-9-05: Transportation of slot machines to and from casino facility

The following is in consideration of the change in notification of the transportation of slot machines and related equipment; a revision that represents a change in timing only and therefore does not have an effect on required working hours or other non-monetary factors.

The Commission notes that it is reasonable to presume that in most cases a casino operator will adapt to the new notification period by extending the notification backwards into the purchasing process, thus simply changing the notification of shipment date in order to comply with the rule, rather than postponing the delivery and operation of the device. Under this presumption, the monetary cost remains unchanged.

Further, it should be noted that some shipments to existing operations are for the replacement of an existing functional device on the floor. The new device would take the place of the old one, with the old still operating during the extended notification period. Therefore, in this event, the cost of compliance would only be the difference in hold between the two games over the extended period. This estimation would vary based on the individual instance.

However, the monetary cost of compliance could be estimated in the event that the casino operator would actually push back the delivery and operation of a new, non-replacing device, or a device replacing an existing non-functional device, due to the increase in notification period as follows:

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During the month of July 2012 (the month of the latest available revenue report), 4,106 electronic gaming devices were operated in Ohio with a related hold or adjusted gross revenue (AGR)¹ of \$31,186,735.00. This represents an average monthly hold of \$7,760.53 (number of devices/July hold) for each device and an average daily hold of \$250.34 (average monthly hold/31 days in July). Note that 33% of this hold is collected by the state by way of the state's casino tax. Therefore, the cost per device of the extension of the notification period from one day to seven days is \$1,502.04 in total (six days of additional notification multiplied by the average daily hold), translating to an estimated lost hold cost per device of \$1,006.37 (67%) attributed to an operator and an estimated lost tax cost per device of \$495.67 (33%) attributed to the state.

Source: July 2012 Casino Gaming Revenue Report published by the Ohio Casino Control Commission.

3772-9-12: Game Authentication

The Commission has considered the potential negative impact on business for the proposed rule related to game authentication terminals (GAT). As a result of this consideration, potential negative impact to operator licensees appears to be minimal due to the process in which software is routinely updated for slot machines. Mike Forester, Regional Director of Slot Operations for Caesars Entertainment, provided details related to the Cleveland property's costs incurred when upgrading to new software. The Commission has utilized these average cost and labor figures to estimate a potential impact on the business environment.

First, the Commission considered the potential negative impact on business as a result of the acquisition of new game software. Mr. Forester noted that if an update is required as a result of conversion/revocation of software, the operator is generally not charged and receives the update free of charge from the vendor. The Commission notes that software is routinely replaced for conversion/revocation purposes, and that it expects that most GAT compliance would likely be achieved through these routine replacements and not from replacements necessitated solely for the purpose of compliance with the new rule. Further, the Commission estimates the additional cost related to including GAT compliance with these already necessitated updates to be negligible.

However, Mr. Forester stated that in the event the software was actually purchased by the operator from the vendor, the software replacement would cost the operator

¹ Adjusted Gross Revenue ("AGR") is the money received by the casino operator less winnings paid to patrons.

approximately \$3,000 per machine on average. An assumption could be made that the cost to a vendor providing this update for free as noted above could be similar or less than this \$3,000 estimate.

Second, the Commission considered the cost of labor of replacing software for GAT compliance. As noted above, it is anticipated that software updates that include GAT compliance will be performed as a result of a need dictated by software conversion/revocation. However, in the event that the operator would actually replace the software solely for compliance with the GAT rule, Mr. Forester noted that the labor time required for such a replacement would be approximately 20 minutes per game.

3772-9-13: Redemption Kiosks

The Commission has considered the potential negative impact on business for the proposed rule related to redemption kiosks. As a result of this consideration, potential negative impact to operator licensees appears to be minimal due to the fact that many of the newly required actions are already in place for the operator and vendor licensees and potential licensees. This rule sets a framework specific to kiosks for compliance with the requirements. In addition, the requirements of this rule are already in place because the regulation represents both good business practice and is similar to the requirements in other jurisdictions.

However, the potential exists for operators to encounter costs for compliance with this rule. Staff time is required in preparing the minimum internal control standards and complying with such standards. We note that both operators already employ the type of staff likely to be assigned such duties. The slot department and compliance department are likely to be involved in development and compliance related to this rule. Slot technicians, supervisors, and management would ensure technical compliance, while the property's compliance manager would ensure overall compliance.

Additional costs associated with compliance involve the required testing of the device by the Commission or an independent laboratory as would be required by subsection (C) of the proposed rule. Testing would be conducted on each type of machine prior to allowance being made for use. Currently, such testing is conducted by an independent gaming laboratory. For insight into potential costs of compliance for this item, the Commission staff contacted Patrick Moore, Director of Technical Compliance at Gaming Laboratories International (GLI).

In consideration of these costs, Mr. Moore reviewed the proposed rule to determine the estimated number of hours required to certify compliance. Based on his review,

Mr. Moore stated that the total number of hours estimated by GLI to certify compliance would vary based on whether the tested item was a first time certification, a modification, or a transfer of a previously certified kiosk. The estimated number of hours for testing a new kiosk is between 40 and 52 hours. This translates to a total estimated cost for compliance certification of \$5,000-\$6,500 per kiosk (40-52 hours multiplied by the hourly cost provided of \$125.00). The estimated number of hours for testing a modified kiosk is between 28 and 32. This translates to a total estimated cost for compliance certification of \$3,500-\$4,000 per kiosk (28-32 hours multiplied by the hourly cost provided of \$125.00).

In addition to the hourly cost noted above, Mr. Moore stated that a final cost would be assessed upon certification of each type of device of between \$395.00 to \$995.00.

3772-10-05: Forms, records, and documents

The addition of the requirement that casino operators keep a log entry into redemption kiosks is required by the new proposed rule, 3772-9-13. For information regarding the impact on business, please see the analysis for 3772-9-13.

3772-10-18: Table drop boxes and slot bill validator canisters: physical requirements and transportation

Changes made to 3772-10-18 have a positive impact on the business environment as they decrease the regulatory requirement for locks on a bill validator canister from two locks to one single lock. Therefore, there is no negative impact on business resulting from this rule change, but rather, there is a positive impact as a result of reduced costs related to purchasing, installation, and maintenance. Both licensed casino operators have requested and been granted waivers from the original provision prior to operation, thus allowing for the use of bill validator canisters with only one lock. Therefore, this rule change reflects the actual operational environment in the state.

Still, the Commission is able to perform an estimation of cost savings generated by this regulatory change by considering the savings related to a decrease of one required lock per bill validator. The Commission contacted Mike Forester, Regional Director of Slot Operators for Caesars Entertainment to inquire about costs related to bill validator canisters had the casino been required to purchase, install, and maintain a second lock.

First, the Commission considered costs related to purchasing a second lock. Mr. Forester noted that while bill validator lock prices vary, the operator's average price is about \$11.00 per lock. Using this purchase price estimate, and an estimated number of bill validator canisters in operation in Cleveland of 4,166 (2,083 slot

machines in operation as of the end of July per the Revenue Report multiplied by 2 bill validator canisters per machine), the Commission calculated approximate savings. As a result, the estimated cost savings related to purchasing had a requirement been in place for the two lock system is approximated \$45,836 for the operator. It is the Commission's estimation that this savings would be similar for other licenses with slight variations created by differing purchasing prices and number of canisters.

Second, the Commission considered savings related to labor that would have been required in the installation of the second lock. Mr. Forester noted that installation of a bill validator lock takes approximately 10-15 minutes. The 10 minute (low end) estimate will be used for conservatism related to estimation of savings. Again, considering the number of bill validator canisters in operation, in Cleveland, the approximate savings is 694 labor hours (10 minutes of labor multiplied by 4,166 canisters) for the operator. The Commission estimates that this savings would be similar for other licensees with slight variations created by differing labor requirements and number of canisters.

Finally, the Commission considered labor savings related to the maintenance of one less lock per canister. The Commission notes that significant time savings will be realized in the maintenance and slot drop procedures, as one less lock must be maintained and or opened each time a canister is accessed. This savings is difficult to quantify, but it will assist the operators in creating greater efficiencies.

3772-10-28: Amendments to internal control plans

Changes made to 3772-10-28 will have a positive impact on the business environment as they decrease the amount of time required for certain internal changes to receive preliminary approval. Therefore, there is no negative impact on business resulting from this rule change, but rather a positive impact as a result of a reduced waiting period for approval of internal control changes. While difficult to quantify, it is possible that this rule could save an operator in excess of 30 days of approval waiting time (or the period of time between the request and the next scheduled monthly Commission Meeting). This rule will allow the licensed operators to immediately implement certain necessary internal control changes.

3772-11-11: Chip Specifications

The change made in 3772-11-11 is a change in terminology only (from the term of art "marker" to the word "sign") and will not require any action on behalf of the operators. Therefore this change has no effect on the business environment.

3772-11-13: Primary, secondary, and reserve sets of gaming chips

Changes made to 3772-11-13 have a positive impact on the business environment as they decrease the requirements for reserve chips from having reserve chips for all denominations to having reserve chips for denominations of \$25.00 and higher. This change substantially reduces the cost of compliance for the casino operators.

Therefore, there is no negative impact on business resulting from this rule change; rather, there is a positive impact on business as a result of reduced regulation. Both licensed operators have requested and been granted waivers from the original provision. Therefore, this rule will reflect the actual operational environment in the state.

Still, the Commission is able to perform an estimation of cost savings by this regulatory change by considering the savings related to a decrease in secondary chips that the operators would need to purchase. The Commission staff contacted Tosha Skipper, Director of Table Games for Horseshoe Casino Cleveland, to obtain information related to the savings realized as a result of not having to comply with the original rule.

The savings realized by operators is directly related to a decrease in required secondary chip purchases. Ms. Skipper provided details of the chip purchases originally made for operation in the state and also provided details on how many chips would have been purchased for denominations under \$25.00 in the secondary set. Based on the figures provided by Ms. Skipper, the Commission notes that the amount of savings realized was \$118,379.00, an amount directly related to not having to purchase secondary chips as required by the existing rule (decrease in required purchase of 104,760 chips multiplied by \$1.13 per chip). The Commission expects this savings amount to be similar for the other casino operators.

The Commission also estimates that additional savings related to the avoidance of purchasing all denominations includes personnel hours for monitoring the extra chips and security features such as space in the vault for storage.

3772-11-42: Poker room; banks and transactions

The changes made to 3772-11-42 have no impact on the business environment as they only serve as clarification of the existing rule. The noted activities were already taking place and it was not the intention of the Commission to limit these activities under the previous rule. The Commission does not anticipate these changes to have any impact on the conduct of casino gaming.

15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

First, the Commission notes that some of the rule changes included in this packet have a positive impact on business in Ohio. Moreover, some changes are clarifications to existing rules which are not anticipated to change casino operator or gaming-related vendor operations and therefore have no effect on business.

Second, the regulatory intent justifies the adverse impact because Article XV, Section 6(C) of the Ohio Constitution and Chapter 3772 of the Revised Code requires the Commission to ensure the integrity of casino gaming. The Commission is charged with the responsibility of requiring the casino operators to establish and implement minimum internal control standards. These proposed changes and rules do just that.

Finally, the regulatory intent justifies the adverse impact because casino gaming is a highly regulated industry. This is so for two main reasons. First, unregulated casino gaming can pose a threat to the public welfare. Second, casino gaming involves numerous cash transactions that do not involve receipts, which raises the potential for fraud and abuse. To mitigate these potential threats, the Commission, like other gaming regulatory bodies, is using its regulatory authority to establish a “best practices” framework that licensed casino operators and gaming-related vendors must follow.

Regulatory Flexibility

16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

Yes (indirectly), though it is unlikely this will be necessary since these proposed regulations only impact the casino operators and certain gaming-related vendors, none of which likely constitute a small business. These proposed rules indirectly provide exemption or alternative means of compliance through 3772-1-04, which permits the Commission, upon written request, to grant waivers and variances from the rules adopted under Chapter 3772 of the Revised Code, including these rules, if doing so is in the best interest of the public.

17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Though it is unlikely section 119.14 of the Revised Code will apply to these proposed rules because the rules only impact the casino operators and certain gaming-related vendors, none of which likely constitute a small business, the Commission will adhere to the statutory requirements thereunder, if applicable.

To the extent section 119.14 of the Revised Code would apply to a violation of these proposed rules, the Commission will provide verbal and written notification to the small business in an attempt to correct the paperwork violation. Thereafter, the Commission would allow the small business a reasonable time to correct the violation. The Commission and its staff would also offer any additional assistance necessary to aid in remediation of the violation. No further action would be taken unless the small business fails to remedy the violation within the reasonable time allotted by the Commission.

18. What resources are available to assist small businesses with compliance of the regulation?

The Commission and its staff are dedicated to working with members of the regulated community and the public to effectively and efficiently regulate casino gaming in this state. As a result, the following resources are available:

- Commission' s mailing address:
10 West Broad Street, 6th Floor
Columbus, OH 43215
- Commission' s toll free telephone number : (855) 800-0058
- Commission' s fax number: (614) 485-1007
- Commission' s website:<http://www.casinocontrol.ohio.gov/>
- Commission' s email:Info@casinocontrol.ohio.gov
- Sign up for Commission email updates: <http://www.casinocontrol.ohio.gov/JoinUs.aspx>

Also, all members of the regulated community and the public may, in accordance with rule 3772-2-04, request to address the Commission during a public meeting. Finally, all members of the regulated community may, pursuant to rule 3772-1-04, request waivers and variances from Commission regulations.