

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

In 2010, the NIGC posted on its web-site draft Class II MICS. This document will compare the 2010 draft MICS to the TGWG MICS proposal.

Class III MICS	TGWG Version
<p>§ 543.23 What are the minimum internal control standards for surveillance for Tier A gaming operations?</p> <p>Due to the length of the 2010 Draft Regulation (32 pages), it is attached to this comparison document.</p>	<p>§ 543.23 What are the minimum internal control standards for surveillance?</p> <p>Due to the length of the TGWG edits, please consult the TGWG working document, Appendix 1 for detailed edits.</p> <p>(c) Surveillance Equipment and Control Room(s). Controls must be established in a manner designed to prevent unauthorized access and/or activities, misappropriation, forgery, theft, or fraud. Such controls must include, but not be limited to, the following:</p> <ol style="list-style-type: none"> (1) For Tier A, the surveillance system shall be maintained and operated from a secured location, such as a locked cabinet. For Tier B and C, the surveillance system shall be maintained and operated from a staffed surveillance operation room(s). (2) The surveillance operation room(s) shall be secured to prevent unauthorized entry. (3) Access to the surveillance operation room(s) shall be limited to surveillance agents, and other persons authorized. (4) Surveillance operation room(s) access logs shall be maintained. (5) Surveillance operation room equipment shall have total override capability over all other satellite surveillance equipment located outside the surveillance operation room. (6) Power loss to the surveillance system. <ol style="list-style-type: none"> (i) For Tier A, in the event of power loss to the surveillance system, immediate alternative security measures, such as additional supervisory or security agents, shall be provided. (ii) For Tier B and C, in the event of power loss to the surveillance system, an auxiliary or backup power source shall be available and capable of providing immediate restoration of power to all elements of the surveillance system that enable surveillance agents to observe all areas covered by dedicated cameras. (7) The surveillance system shall record an accurate date and time stamp on recorded events. The displayed date and time shall not significantly obstruct the recorded view. (8) All surveillance agents shall be trained in the use of the equipment, and be knowledgeable of the

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

	<p>games and house rules.</p> <p>(9) Each camera required by the standards in this section shall be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled.</p> <p>(10) The surveillance system shall:</p> <p>(i) Have the capability to display all camera views on a monitor;</p> <p>(ii) Include sufficient numbers of recording devices to record the views of all cameras required by this section;</p> <p>(iii) Record all camera views; and</p> <p>(iv) For Tier B and C only, include sufficient numbers of monitors to simultaneously display gaming and count room activities.</p> <p>(11) A periodic check of the surveillance systems shall be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs shall be documented and repairs initiated within seventy-two (72) hours.</p> <p>(i) If a dedicated camera malfunctions, immediate alternative security measures, such as additional supervisory or security agents, shall be provided.</p> <p>(ii) The TGRA shall be notified of any surveillance system and/or camera(s) that have malfunctioned for more than twenty-four (24) hours and the alternative security measures being provided.</p> <p>(d) Additional Surveillance Requirements. With regard to the following functions, the additional specified controls shall be implemented:</p> <p>(1) Bingo.</p> <p>(i) For manual draws, the surveillance system shall monitor the bingo ball drawing device or mechanical random number generator, which shall be recorded during the course of the draw by a dedicated camera to identify the numbers or other designations drawn.</p> <p>(ii) The surveillance system shall monitor and record the activities of the bingo game, including drawing, calling, and entering the numbers or other designations.</p> <p>(2) Card games.</p> <p>(i) Except for card game tournaments, a dedicated camera(s) shall be used to provide:</p> <p>(A) An overview of the activities on each card table surface, including card faces and cash and/or cash equivalents;</p> <p>(B) An overview of card game activities, including patrons and dealers; and</p> <p>(C) An unobstructed view of all posted progressive pool amounts.</p> <p>(ii) For card game tournaments, a dedicated</p>
--	--

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

	<p>camera(s) shall be used to provide an overview of tournament activities, including entrances/exits and any area where cash or cash equivalents are exchanged.</p> <p>(3) Prize Winning Events. The TGRA shall establish standards for surveillance camera coverage of prize winning events. Dedicated camera coverage is required when the progressive base value or prize amount exceeds \$3,000,000.00. Recorded camera coverage shall include the activities of patrons and agents at the time and location of the prize winning event.</p> <p>(4) Cash and Cash Equivalents.</p> <p>(i) The surveillance system shall monitor and record:</p> <p>(A) A view of the patron, cage agent, vault agent or count team agent(s) and the surrounding area and counting surface;</p> <p>(B) Payouts of gaming winnings;</p> <p>(C) Entry and exit doors to and from the cage, vault and other secured count areas;</p> <p>(D) All count equipment including but not limited to reject bins, weigh scales, wrapping machines, currency and coin counters, and chips sorters;</p> <p>(E) Any area where the manipulation of recorded data may occur;</p> <p>(F) Drop and count while in process; for Tier A and B operations, if the count is not viewed live, the operation must establish controls to ensure a review of the recording within seven (7) days by an agent independent of the count operation and the count being reviewed. For Tier C operations, the count shall be viewed live.</p> <p>(G) All drop boxes and storage racks by either a dedicated camera or a motion-detector activated camera.</p> <p>(ii) During the count process a dedicated overhead camera(s) or motion-detector activated camera(s) must cover the:</p> <p>(A) Transaction area with the ability to identify cash and cash equivalent values;</p> <p>(B) All counting surfaces used during the count; and</p> <p>(C) All drop boxes and their storage racks.</p> <p>(e) Recording Retention. Controls must be established that include, but are not limited to, the following:</p> <p>(1) All recordings required by this section shall be retained for a minimum of seven (7) days; and (2) Suspected or confirmed gaming crimes, unlawful or suspicious activity, or detentions by security personnel discovered within the initial retention period shall be copied and retained for a time</p>
--	---

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

	<p>period, not less than one (1) year.</p> <p>(f) Logs. Logs must be maintained and demonstrate the following:</p> <p>(1) Compliance with the storage, identification, and retention standards required in this section;</p> <p>(2) Each malfunction and repair of the surveillance system as defined in this section; and</p> <p>(3) Activities performed by surveillance agents.</p>
--	--

NIGC Comments and Questions Regarding the TGWG Proposed Regulation (questions in blue)

General Comments

The format and organization of the MICS pertaining to Surveillance between the MICS Advisory Committee and the TGWG proposal differs in following four major ways:

1. The TGWG has combined 543.23 Tier A, 543.33, Tier B and 543.43 Tier C into one surveillance standard labeled 543.23. In the TGWG version, “clarifications” were added to the standard for variations or specific requirements unique to a particular tier instead of having separate surveillance MIC standards for each tier. This appears to have been done to reduce redundant verbiage and simplify the standard;
2. Surveillance requirements contained in MICS standards other than Surveillance, e.g. Bingo, Cage, etc., were removed from those sections and included in the single TGWG surveillance standard 543.23. This appears to have been done to simplify the standard to include all MICS surveillance standards in one section;
3. Much of the specificity that was included in the MICS Advisory Committee proposed Surveillance MICS has been eliminated in the TGWG version;
4. The definition of “Sufficient Clarity” has been removed in the TGWG proposed MICS. By removing this definition, the MICS are weakened and the risk of fraud occurring and not being detected is increased as the Surveillance Department may not have a system that is able to view, record and perform reviews of critical camera coverage.

The simplification of the surveillance standard into one standard appears to be consistent with the intent of the 2010 Draft Regulation. Eliminating the definition of “sufficient clarity” and the lack of specificity included in the TGWG proposed standard results in ambiguity and does not provide the tribes with minimum guidelines that are standard throughout the gaming industry. Without such specificity and the inclusion of the definition of “sufficient clarity,” the risk of loss to the gaming operation is increased.

The TGWG version incorporated and/or modified standards from all three of the 2010 Draft Regulation proposed sections 543.23, 543.33, and 543.43. Inclusion of the red-line version of the TGWG 543.23 in the right column and the three Surveillance sections proposed by the MICS Advisory Committee resulted in a repetitive and unwieldy text that was very difficult, if not impossible, to follow. Therefore, in an effort to simplify the review of the differences between the MICS Advisory Committee and the TGWG versions, the proposed TGWG MICS for surveillance in the right column and 543.43 (Tier C) MICS, which is the most inclusive of the MICS Advisory Committee Surveillance sections, in the left column.

There is no guidance in either the 2010 version or the TGWG proposed version for cross referencing IT requirements. [For example, what are the requirements for vendor/vendor agent remote access to surveillance systems for troubleshooting purposes? Can vendor or vendor “agent” access be segregated](#)

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

from real-time recording or any stored content? What about incident response requirements and vendor responsibilities?

The MICS do not contain a definition of, or provide a measurable acceptability of, video which is required by dedicated camera, recorded, or monitored. Previous MICS contained a definition of “sufficient clarity” for example. Proposed MICS revisions contained requirements pertaining to the resolution of digital recordings. Without these types of parameters, whatever they might be, there is nothing to guarantee that video is satisfactory for the purposes stated in the control.

No controls appear to exist for Surveillance standards relating to Bingo gaming machines and play. An example would be a dedicated camera showing the “face of the gaming machine sufficient to determine the payout line.” Only controls for Bingo are provided. For example, no controls appear to exist for cash and cash equivalents, coverage of Kiosks, or “wherever cash or cash equivalents are stored.”

Additionally, the following issues stand out as possible weaknesses which need to be addressed further:

- Possible requirement of a back up generator for loss of power situations.
- No requirement to document training.
- No required coverage of Bingo game boards.
- No clarity on what is required to be maintained in logs, or how long logs are to be retained.
- Guidance Documents on Variances needs to be clarified and reviewed for appropriateness as it applies to Surveillance operations.
- Guidance Documents on Risk Assessments needs to be clarified and reviewed for appropriateness as it applies to Surveillance operations.
- Guidance Documents on Access to Surveillance is unclear and the example access matrix may need further discussion on permissions (i.e. General Manager, NIGC representatives, and others...).
- Guidance Documents on performing a surveillance system check may be limiting or unobtainable even.
- Additional Surveillance Requirements are required of the “Gaming Operation” in the Guidance Documents, and not of the TGRA or Surveillance as typical.
- Guidance Documents for Audit and Accounting needs to be clarified and reviewed for appropriateness as it applies to Surveillance operations.

Definitions

Effect of 2010 Draft Regulation: The standards that incorporate the requirement for “sufficient clarity” require sufficient clarity to perform a specific task, e.g. identify an object or characteristic, verify an amount, etc. If a surveillance system is capable of recording at 30 fps or if digital, recording with a resolution of at least 4 CIF, but the observer is unable to identify or verify the required item(s) or transaction(s), the standard is not satisfied.

Effect of TGWG Proposal: The deletion of the definition of “Sufficient Clarity,” which is frequently referred to in the 2010 Draft Regulation surveillance MICS, eliminates the specifications necessary to produce a video record appropriate for the critical coverage areas. This is a critical requirement of a casino surveillance system. A casino may have a multimillion dollar surveillance system but be unable to record images with sufficient clarity to adequately review recordings due to factors such as inadequate CIF rate, an insufficient FPS rate, an inadequate number or quality of cameras, poor lighting, or poor camera placement. The requirements for “sufficient clarity” specify sufficient clarity to perform a specific task, e.g. identify an object or characteristic, verify an amount, etc. Removing this definition weakens the MICS and increases

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

the risk of fraud as the Surveillance Department does not have a system that is able to view, record, and perform reviews of critical camera coverage.

Tribal Internal Control Standards

Effect of 2010 Draft Regulation: Comparable standard is 543.3(c), which defines the deadline by which each TGRA must establish and implement internal controls and provides criterion against which TICS are measured (federal rule)

Effect of TGWG Proposal: Standard appears to be redundant, at least in part, with 543.3(c) (TGWG version 543.3(b)) and therefore unnecessary. Furthermore, the standard that it appears to be attempting to reiterate actually states the tribal system of internal controls must equal or exceed the federal rule. TGWG version states that gaming operation policies and procedures approved by the TGRA must provide a level of control established by the standards in the TGWG text. One would assume that the TGRA would approve only those policies and procedures that meet this criterion. Therefore, the standard is somewhat self-evident

Surveillance Room

Effect of 2010 Draft Regulation: The Draft Regulations are intended to provide control procedures for staffing and access to the surveillance room. Such controls have been a long established standard in the gaming industry.

Effect of TGWG Proposal: The proposed TGWG standard appears to be consistent with proposed 543.23, 543.33, and 543.43 (except for 543.23).

Access to Surveillance Room

Effect of 2010 Draft Regulation: The 2010 Draft Regulation requires the surveillance department to maintain a sign-in log of persons entering the surveillance operation room.

Effect of TGWG Proposal: The proposed standard appears to be inconsistent with proposed 543.23, 543.33, and 543.43. It does not specify what type of information must be included in the access log. The 2010 Draft Regulation requires the surveillance department to maintain a sign-in log of other authorized persons entering the surveillance operation room. Such a record provides documentation of the entry by individuals other than surveillance personnel and designated staff into the surveillance room and the reason for entry.

Override Capability

Effect of 2010 Draft Regulation: The 2010 Draft Regulation prevents anyone outside the surveillance room from using satellite equipment to override surveillance activity inside the surveillance room.

Effect of TGWG Proposal: The proposed TGWG standard appears to be consistent with Draft Regulations in 543.23, 543.33, and 543.43.

Power Loss

Effect of 2010 Draft Regulation: The 2010 Draft Regulation is intended to ensure the critical areas of a gaming operation's surveillance system will continue to operate during a power failure.

Effect of TGWG Proposal: The proposed standard appears consistent with proposed 543.23, 543.33, and 543.43.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

Date and Time Recording

Effect of 2010 Draft Regulation: The Draft Regulation requires all recordings of camera views to be time and date stamped in order for documents to be properly archived and retrieved and to document the precise time and date and event occurred.

Effect of TGWG Proposal: The proposed standard appears consistent with proposed 543.23, 543.33, and 543.43.

Trained Personnel

Effect of 2010 Draft Regulation: The 2010 Draft Regulation ensures that at least one person is in the surveillance room at all times to ensure continuous monitoring. This does not apply to a Tier A facility surveillance room, for which there must be at least one person available at all times with a working knowledge of, and the ability to operate the surveillance equipment. The intent of the standard is to ensure that surveillance staff has the proper training in the use of the surveillance equipment, the games, and house rules so as to be capable of performing their duties.

Effect of TGWG Proposal: Proposed addition, modification and deletions are not consistent with 543.23, 543.33, and 543.43 as there is no requirement that the surveillance room be attended at all times or that, for Tier A facilities, at least one person that has the ability to operate the surveillance equipment be readily available at all times. Failure to include such a standard increases the risk of not having continuous monitoring of the surveillance room and, consequently, that fraud or theft could go undetected.

Tampering

Effect of 2010 Draft Regulation: The intent of the Draft Regulation is ensure that all cameras are not readily tampered with and to ensure continuous camera coverage.

Effect of TGWG Proposal: The proposed standard appears consistent with proposed 543.23, 543.33, and 543.43.

Monitoring & Recording Capability

Effect of 2010 Draft Regulation: The Draft Regulation's intent is to ensure that "pictures" from all cameras can be reviewed on a monitor and that multiple camera views for the gaming and count can be simultaneously be displayed and recorded.

Effect of TGWG Proposal: The proposed standard appears consistent with proposed MICS 543.23, 543.33, and 543.43.

Testing and Maintenance

Effect of 2010 Draft Regulation: The intent of the Draft Regulation is to ensure that malfunctions of surveillance equipment are repaired within 72 hours, and that alternative camera coverage or other measures are put in place until the malfunction is resolved. Additionally, the TGRA is to be notified in a timely manner if the surveillance coverage or sufficient clarity does not meet requirements. The ultimate goal is to have adequate alternative surveillance or security when a malfunction occurs..

Effect of TGWG Proposal: The proposed TGWG standard does not appear to be consistent with proposed 543.23, 543.33, and 543.43(2). The TGWG version does not stipulate that a lack of sufficient clarity is

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

considered a malfunction. Under the TGWG version, the TGRA would not be notified if a camera records without sufficient clarity to perform an adequate review, but not be considered malfunctioning. The purpose of a surveillance system is to monitor and record the activity in the casino in a manner that can be monitored in real time and reviewed at a later date. *Sufficient clarity* is the level of clarity required to perform a specific task, e.g. identify an object or characteristic, verify an amount, etc. By removing this definition from the standard, the MICS are weakened and the risk of fraud or theft is increased.

Additional Surveillance Requirements

Effect of 2010 Draft Regulation: The 2010 Draft Regulation contains the requirements not only for adequate camera coverage but also for “sufficient clarity” to identify the balls drawn or numbers selected. Surveillance also monitors and records the game board and the overall activity of personnel operating the game. This enables surveillance to detect fraud or theft and to respond to patron complaints.

Effect of TGWG Proposal: The proposed TGWG standard does not appear to be consistent with proposed 543.23, 543.33, and 543.43(k)(1). The TGWG version does not stipulate that a lack of sufficient clarity is considered a malfunction. Under the TGWG version, the TGRA would not be notified if a camera records without sufficient clarity to perform an adequate review, but not be considered malfunctioning. The purpose of a surveillance system is to monitor and record the activity in the casino in a manner that can be monitored in real time and reviewed at a later date. *Sufficient clarity* is the level of clarity required to perform a specific task, e.g. identify an object or characteristic, verify an amount, etc. By removing this definition from the standard, the MICS are weakened and the risk of fraud or theft is increased.

Card Games

Effect of 2010 Draft Regulation: The intent of the Draft Regulation is to monitor and record general activities in each card room with sufficient clarity to view patrons, dealers, and activities on the card table surfaces.

Effect of TGWG Proposal: The proposed standard appears to be consistent with proposed 543.23, 543.33, and 543.43, and includes standards not included in the Draft Regulation which appear to strengthen the surveillance internal controls over card games and card game tournaments.

Player Interfaces and Prize Payouts

Effect of 2010 Draft Regulation: The effect of the Draft Regulation is to ensure that there is adequate surveillance coverage of player interfaces with large jackpots to enable gaming operations to review, with sufficient clarity, the prize payout line on a player interface. This capability is critical in confirming jackpot payouts and to research and settle potential customer disputes, without which harm to the reputation of the gaming facility could result such as when there is insufficient evidence to deny a claim due to a machine or program malfunction.

Effect of TGWG Proposal: Proposed addition, modification and deletions are not consistent with 543.23, 543.33, and 543.43 as they lack specificity. The proposed TGWG MICS only address payouts in excess of \$3,000,000.00 for progressive base value or prize amounts. In addition, the proposed TGWG MICS do not require dedicated cameras on the face of the player interface with a jackpot amount of less than \$3,000,000.00. If there were a patron complaint, there would potentially be no surveillance coverage of the face of a machine with a jackpot between \$250,000 and \$3,000,000. The reputation of the gaming facility would be at risk if a jackpot claim was denied without sufficient evidence to support the denial. Furthermore, there is the potential that payouts resulting from fraud or machine errors could not be contested due to lack of sufficient documentation.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

Cage and Vault

Effect of 2010 Draft Regulation: The Draft Regulation requires camera recordings of each cage and vault area that are of sufficient clarity to identify individuals within the cage, patrons and staff members at the counter areas, to confirm the amount of each cash transaction occurring between staff members and between staff members and patrons, coverage of scales of sufficient clarity to view any attempted manipulation of the recorded data, all areas where currency may be stored or counted, view the currency input, output and reject areas of currency sorting machines and to identify the chip values and the amounts on the fill and credit slips. This regulation's intent is to safeguard the most important assets of the casino: cash; cash equivalents; and the related supporting documentation.

Effect of TGWG Proposal: The proposed standard is inconsistent with proposed 543.23, 543.33, and 543.43. The deletion of the definition of "Sufficient Clarity," which is frequently referred to in the 2010 Draft Regulation surveillance MICS, eliminates the specifications necessary to produce a video record appropriate for the critical coverage areas. This is a crucial requirement of a casino surveillance system. A casino may have a multimillion dollar surveillance system but be unable to record images with sufficient clarity to adequately review recordings due to factors such as inadequate CIF rate, an insufficient FPS rate, an inadequate number or quality of cameras, poor lighting, or poor camera placement. The requirements for "sufficient clarity" specify sufficient clarity to perform a specific task, e.g. identify an object or characteristic, verify an amount, etc. Removing this definition weakens the MICS and increases the risk of fraud as the Surveillance Department does not have a system that is able to view, record, and perform reviews of critical camera coverage.

Recording Retention

Effect of 2010 Draft Regulation: The Draft Regulation requires recordings/digital records to be maintained for a period of seven days and a minimum of thirty (30) days for recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel.

Effect of TGWG Proposal: The proposed TGWG standards extends the retention period for recordings of suspected and confirmed gaming crimes, etc from 30 days to one year. The proposed TGWG standards appear to be consistent with those contained in 543.23, 543.33, and 543.43 of the 2010 Draft Regulation.

Provision of Recordings to NIGC

Effect of 2010 Draft Regulation: The 2010 Draft Regulation requires the gaming facility to provide requested surveillance footage at the request of NIGC staff.

Effect of TGWG Proposal: The TGWG proposal is not consistent with 543.23, 543.33, and 543.43. It does not require authenticated copies of video recordings and/or digital records to be provided to the Commission upon request, thus allowing the gaming facility to potentially deny the NIGC access to surveillance recordings.

Video Logs

Effect of 2010 Draft Regulation: The 2010 Draft Regulation establishes a minimum standard of information that must be included in the Video Library Log, the Malfunction and Repair Log, and the Surveillance Log (or comparable alternative procedure). For the Malfunction and Repair Log, the Draft Regulation requires the log to contain: the time; date; nature of each malfunction; the efforts expended to repair the malfunction; the date of each effort; the reasons for any delays in repairing the malfunction; the date the

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

malfunction is repaired; and where applicable, any alternative security measures that were taken. The Draft Regulation requires the surveillance log to contain, at a minimum, the following information: date; time commenced and terminated; activity observed or performed; and the name or license credential number of each person who initiates, performs, or supervises the surveillance. Surveillance personnel are also required to record a summary of the results of the surveillance of any suspicious activity. This summary may be maintained in a separate log. The Draft Regulation also sets a retention period for the above logs as a minimum of one year after the date of the last entry in it.

Effect of TGWG Proposal: Proposed addition, modification and deletions are not consistent with 543.23, 543.33, and 543.43 as they lack specificity. The TGWG proposed MICS do not include the minimum information to be recorded in the logs. Without listing the minimum required information the potential for a log to contain inadequate information is increased and a valuable source of information may not be available to the TGRA and the Commission. Furthermore, the TGWG version does not provide for the use of a comparable alternative procedure. In addition, the TGWG proposed MICS do not state the retention period for the logs.

Digital Video Standards

Effect of 2010 Draft Regulation: The standards that incorporate the requirement for “sufficient clarity” specify sufficient clarity to perform a specific task e.g. identify an object or characteristic, verify an amount, etc. If a surveillance system is capable of recording at 30 fps or if digital, recording with a resolution of at least 4 CIF, but the observer is unable to identify or verify the required item(s) or transaction(s), the standard is not satisfied.

Effect of TGWG Proposal: The proposed TGWG standard appears not to be consistent with proposed 543.23, 543.33, and 543.43 except for the 7 day storage capacity standard contained in (e)(1). The TGWG proposed MICS do not include a comparable standard. The deletion of “Sufficient Clarity” from the TGWG proposed MICS eliminates the criteria which is necessary to produce a video record appropriate for the critical coverage areas to which the term applies. This is a critical requirement of a casino surveillance system. A 4 CIF rate and 30 Frames Per Second (FPS) are considered real time recording and are the gaming industry standard for recording critical camera views. When reviewing a camera view recorded at a lower CIF rate than 4 CIF or less than 30 FPS the recording becomes pixilated and the images become jerky and not a continuous moving image as it would be in a real time recording. A casino may have a multimillion dollar surveillance system but not be able to record images with sufficient clarity to adequately review critical camera recordings due to factors such as the system having an inadequate CIF or FPS recording rate, an inadequate number or poor quality of cameras, inadequate lighting or poor camera placement. The requirements for “sufficient clarity” specify sufficient clarity to perform a specific task e.g. identify an object or characteristic, verify an amount, etc. By removing this definition the MICS are weakened and the risk of fraud is increased as the surveillance department may not have a system that is able to view, record, and perform reviews of critical camera coverage.

Failure Notification

Effect of 2010 Draft Regulation: The 2010 Draft Regulation requires the surveillance system to have an alarm system to notify staff in the event there is an equipment failure in the surveillance system. The Draft Regulation also requires the system to be configured to prevent loss of surveillance data due to the failure of a single component of the media storage system.

Effect of TGWG Proposal: Proposed addition, modification and deletions are not consistent with 543.43 as there is no requirement for audio or visual alarms in the event of a surveillance system or DVR failure. Without an alarm system or a backup system a gaming operation could lose critical surveillance recordings due to lack of time discovery of an equipment failure.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

Outside Access

Effect of 2010 Draft Regulation: The Draft Regulation requires approval for security measures for surveillance equipment located outside of the secure surveillance location and security measures above are required to be followed to ensure the security of the surveillance system. The intent is to prevent unauthorized access from a location outside the surveillance room.

Effect of TGWG Proposal: Proposed addition, modification and deletions are not consistent with 543.23, 543.33, and 543.43 as there is no requirement for approval or for security measures for surveillance equipment located outside of the secure surveillance location. This increases the risk of unauthorized persons gaining access to the surveillance system which increases the risk of theft or fraud and potentially lost revenues and assets to the Tribe.

Date and Time Stamps

Effect of 2010 Draft Regulation: The Draft Regulation requires the date and time stamp to be superimposed on the digital recording, the software to view the DVR images, and a watermark. This regulation ensures the date and time is noted on the recording, that a person reviewing the recording has the appropriate software to view the recording and that a watermark is recorded on the recording to prove its authenticity and that it has not been tampered with.

Effect of TGWG Proposal: With the exception of the requirement to superimpose the time and date stamp on the recording, the TGWG proposed MICS do not include a comparable standard. Without the requirements of the Draft Regulation, a DVR recording may not be able to be viewed because the software is not supplied and there may be no way of confirming the authenticity of the recording without a watermark.

Repair and Replacement

Effect of 2010 Draft Regulation: The Draft Regulation requires that in the event of a total system failure of the DVR storage system, the system be repaired within 8 hours.

Effect of TGWG Proposal: The TGWG proposed MICS do not contain a comparable standard for total system failure. It is critical that the surveillance system be restored as quickly as possible after a total system failure as many gaming facilities require the casino to shut down gaming if there is no way to record the surveillance cameras.

Secured Area

Effect of 2010 Draft Regulation: The Draft Regulation requires locating the DVR equipment in a secure area controlled by surveillance in order to prevent unauthorized access to surveillance recordings. Unauthorized access could allow a person to delete or alter recordings of criminal activity or fraud and could cause a loss of revenue to the gaming facility.

Effect of TGWG Proposal: The TGWG proposed MICS do not contain a comparable standard for locating the DVR equipment in a secured area controlled by surveillance. This increases the risk of unauthorized persons gaining access to the surveillance system, which increases the risk of theft or fraud and potentially lost revenues and assets to the Tribe.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

Surveillance standards located in MICS Advisory Committee sections in addition to 543.23, 543.33, and 543.43

Effect of 2010 Draft Regulation: The Draft Regulation requires a count team member to show empty card game drop boxes or player interface storage components to Surveillance as a means to verify the box is empty.

Effect of TGWG Proposal: The TGWG proposed MICS is not consistent with 543.21, 543.31 and 543.41. The requirement of showing the empty drop box or storage component to the surveillance camera is not included in the TGWG proposed MICS relating to surveillance standards located in 543.23. This procedure is designed to reduce fraud as it verifies that there is no currency left in the drop box or storage component container. It was deleted from the Drop and Count standards but not included in the Surveillance standards.

TGWG Guidance

(f) Surveillance Operation Room/Location. For Tiers B and C, the operation must have a dedicated surveillance operation room. For Tier A, the surveillance system shall be maintained and operated from a secured location, such as, a locked cabinet, a locked storage room, or a secure server room.

(1) The surveillance operation room should be a room dedicated to the surveillance system and, for Tiers B and C, manned 24 hours a day by surveillance agents that have been properly trained in surveillance techniques and casino operations.

(2) For Tiers B and C, the surveillance operation room should be in the back of the house (i.e., an area in which access by the general public is prohibited) or offsite, and locked at all times. For Tier A operations, the area or location housing the surveillance system must be locked at all times.

(3) Access.

(i) Access to the surveillance operation room should be governed by a detailed set of internal control policies and procedures. Best practice includes developing a chart or matrix that outlines, by position, who can access the surveillance operation room, surveillance reports, surveillance equipment and surveillance recordings. The matrix should include, but not be limited to those persons requiring routine access, such as regulatory agents, credentialed auditors, and supervisory agents (see example below).

(A) Access is generally limited to surveillance agents and surveillance supervisors.

(B) If other persons need access, an approval process should be in place that provides for an evaluation of their need for access.

(ii) Before anyone not listed on the access chart/matrix may gain entry into the surveillance room, best practice suggests surveillance agents obtain authorization from the TGRA. Such TGRA authorization should be documented on the sign-in log.

(iii) All access made to the surveillance operation room should be recorded through the use of a sign-in/access log. This log should include: date, room entry time, name of person accessing the room, reason for access, department/position, signature of the agent who authorized access, and room exit time.

Example of Access Matrix:

ACCESS TO SENSITIVE AREAS/ASSETS CHART

	Surveillance Room	Surveillance Reports	Surveillance Recordings
General Manager	Unlimited	Unlimited	Unlimited
Security Dir/Mgr/Supv	Unlimited	Unlimited	Unlimited
Surveillance Dir/Mgr/Supv	Unlimited	Unlimited	Unlimited

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

Surveillance Agents	Unlimited	Unlimited	Unlimited
Bingo Dir/Mgr	Denied	(4)	(3/4)
Card Room Dir/Mgr	Denied	(4)	(3/4)
Card Room Lead Floorperson	Denied	(4)	(3/4)
TGRA Agents	Unlimited	Unlimited	Unlimited
Surveillance Equipment Vendors	(2)	Denied	(2)
Human Resources Dir/Mgr	(1)	(4)	(3/4)
Housekeeping Agents	(1)	Denied	Denied
Maintenance Agents	(1)	Denied	Denied
NIGC Agents	(1)	(3)	(3/4)
Local Law Enforcement Officers	(1)	(4)	(3/4)

Restrictions/Conditions:

- (1) May access the area/asset when accompanied by surveillance agents.
- (2) May access the area/asset for maintenance/installation when accompanied by surveillance agents.
- (3) May view under supervision of a Surveillance or Security Supervisors.
- (4) May check out or be issued copies of reports and/or recordings.

NIGC Comment to TGWG Guidance

A General Manager should not have unrestricted access to surveillance. Also, the matrix should eliminate the entry for NIGC Agents as this could contradict the NIGC's access under 25 CFR 571. The use of "should" rather than "shall" or "must" in the guidance could lead the reader to believe that 543.23(f)(1), (f)(2), and (f)(3)(i) are not required by the MICS but that they are recommended.

TGWG Guidance

(g) Surveillance System, Equipment, and Operations Requirements.

(1) Control of Surveillance Equipment. Surveillance operation room agents must have the ability and/or authority to add, remove, or change the settings and capabilities of any satellite surveillance equipment. The primary objective of this control is to ensure that the surveillance agents have the ability to utilize the surveillance system at all times without delay or interference.

(2) Power Loss.

(i) For Tiers B and C, if power is lost to the surveillance system, an auxiliary or backup power source must be capable of providing immediate restoration of power to all elements of the surveillance system that are required in the internal controls. Best practice suggests that UPS **uninterruptible** power supply) bridging and generator are available as backup power sources.

(ii) For Tier A operations, and in the event the auxiliary or back up power source fails in a Tier B or C operation, immediate alternative security measures (i.e., security agents) must be provided.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

(3) Date/Time Stamp.

(i) Best practice suggests surveillance systems should be synchronized with a standard time service (i.e., naval observatory).

(ii) Surveillance agents should test the date/time used by the surveillance system against a standard time service at intervals established by management.

(iii) Best practice suggests cameras should be purposely focused or positioned in a fashion that allows for the date/time stamp to be recorded without obscuring the recorded view.

(4) Surveillance Agent Qualifications. All surveillance agents must be proficient in the use of the surveillance room equipment and have knowledge of all casino games offered to the public for play. Such knowledge must be sufficient to identify inappropriate behaviors and compliance concerns. Surveillance agents must also possess a comprehensive understanding of established standard operating procedures for the departments subject to surveillance.

(5) Cameras.

(i) Best practice suggests that cameras be installed in a housing unit to obscure the camera itself from public view and help ensure it is not physically tampered with.

(ii) Best practice suggests that surveillance agents periodically review each camera to ensure the view has not been obstructed, and the camera has not been tampered with or disabled.

(6) Monitors/Recording Devices.

(i) All camera views required by the MICS must be capable of being displayed on a monitor(s) and recorded.

(ii) Based on the size of the operation, surveillance management must determine the number of: (i) monitors necessary for the surveillance agent(s) to be able to observe more than one activity at a time; and (ii) recording devices necessary to ensure that all camera views required by the MICS are recorded.

(7) Surveillance System Checks.

(i) Based on the size of the operation, surveillance management must determine proper intervals to perform a check of the surveillance system. Best practice suggests once every shift. This periodic check should include visual confirmation that all cameras, monitors, and recording devices are in working order.

(ii) When a malfunction of the surveillance system is discovered, the following procedures should apply:

(A) If immediate correction is possible, correction should be performed and documented on the activity log as to what measures were taken to correct the malfunction. Example – VCR #1 not operational, replaced with new VCR.

(B) If not immediately correctable, the agent who discovered the malfunction should report the malfunction to surveillance management.

(C) Management should determine the necessary immediate steps for alternative security measures to be performed until the malfunction is corrected. Alternative security measures include: repositioning another camera, posting additional security agents, and changing the location of gaming activity.

(D) Management should then identify the source of the malfunction and the necessary steps to perform to correct the malfunction. Corrective measures must be initiated within 72 hours. Upon completion, corrective measures should be documented.

NIGC Comment to TGWG Guidance

Recommend guidance provided for minimum surveillance system standards, (i.e minimum frames per minute for camera recordings). Further, the use of “should” rather than “shall” or “must” in the guidance could lead the reader to believe that 543.23(g)(3)(ii), (g)(7)(ii)(A), (g)(7)(ii)(B), (g)(7)(ii)(C), and (g)(7)(ii)(D) are not required by the MICS but that they are recommended.

TGWG Guidance

(h) Additional Surveillance Requirements. The gaming operation must implement additional surveillance controls for the following gaming areas:

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

(1) Bingo. Surveillance coverage for manual bingo draws should include:

(i) Dedicated cameras that provide sufficient coverage to view the ball draw with at least two views to verify winning balls, blower showing ball number or other designation as drawn, or rabbit ears showing all balls drawn, and/or game board showing numbers or other designations drawn.

(ii) At least one of these views, or a separate view, should show the agent performing the ball draw.

NIGC Comment to TGWG Guidance

No guidance provided for surveillance of Bingo EGM's (Class II gaming devices).

TGWG Guidance

(2) Card Games.

(i) Best practice suggests that a dedicated camera be positioned over each card game table to allow a general overview of card game activities, including patrons and dealers. The general overview is intended to assist in the safeguarding of the table chip tray, ensure the dealer is placing the rake in the drop box, maintain security of the patrons' funds, observe the functionality of the game, and protect the integrity of the play of the game.

(ii) Best practice suggests that camera coverage be provided over any card room bank. This coverage should include a dedicated camera to provide a general overview of the agents, patrons, and activities associated with card room transactions.

(iii) PTZ (pan, tilt, and zoom) cameras should be positioned throughout the card room with the ability to allow for observation of activities and events. Surveillance management should determine, based on the size of the operation, how many PTZ cameras are required to provide adequate supplemental support.

(3) Prize Winning Events.

(i) Based on the size of the operation, management, as approved by the TGRA, must determine the threshold at which prize winning events must be covered by surveillance cameras. For prizes and progressive base values in excess of \$3 million, dedicated camera coverage is mandatory.

(A) For prize payouts that are supported by system documentation or where a gaming system determines the outcome of the game play, camera coverage should give an overview of the activities of the patrons and agents at the time and location of the winning event.

(B) For contests or drawings, where the prize payout is not supported by system documentation, adequate camera coverage and monitoring should include:

(1) Any storage component maintaining patron's entries;

(2) The winning event;

(3) Agents and patrons involved; and

(4) Any event that requires validation of the outcome to maintain confidence and trust that the contest has been conducted fairly.

(4) Cash and Cash Equivalents.

(i) Best practice suggests that the surveillance system has coverage of the activities occurring in all cage, vault, and count room areas to monitor the activities of agents within these areas. Dedicated cameras should also be placed over each transaction area to view exchanges of cash and cash equivalents. Additional cameras should provide coverage of the patrons and agents involved in these exchange transactions.

(ii) Based on the gaming operation's risk assessment, determine what additional camera coverage is needed over cash and cash equivalents stored in cabinets, safes, vaults, drawers, etc., to safeguard those assets. For example:

(A) The operation requires a \$3M cash on hand inventory, three people work in the cage operation area at all times so management determines one camera is sufficient coverage over the storage area.

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

(B) The operation requires a \$3M cash on hand inventory, one person works in the cage operation area at any given time so management determines three cameras are necessary.

(iii) For surveillance coverage during the count process, cameras should be placed in a manner that provides an overview of the count room operations to ensure that:

(A) There are no blind spots in the room;

(B) All procedures and activities being performed by the count team can be viewed;

(C) Irregularities can be detected during the count process; and

(D) Assets are safeguarded.

(iv) Best practice suggests that the surveillance system has the capability of monitoring and recording audio of the count room while the count is in process. This is to enhance investigations into possible misappropriation of funds.

NIGC Comment to TGWG Guidance

The use of “should” rather than “shall” or “must” in the guidance could lead the reader to believe that 543.23(h)(1), (h)(1)(ii), (h)(2)(iii), (h)(3)(1)(A), (h)(3)(i)(B), and (h)(4)(iii) are not required by the MICS but that they are recommended.

TGWG Guidance

(i) Recording Retention.

(1) The surveillance system shall be designed to retain all recordings of coverage provided by the required dedicated cameras for at least seven days, however, a seven-day period may be insufficient for investigatory and other purposes. To accommodate investigatory and other needs, best practice suggests that the retention period be set at 21 days or longer (including the supporting non-dedicated camera recordings).

(2) For incidents and investigations, best practice suggests a review of all applicable statutes of limitation to aid in establishing minimum archiving practices based on incident type.

(j) Logs.

(1) Logs must be developed to show compliance with the standards required in this section.

(2) Best practice suggests maintaining at least two logs for recording retention. One for the minimum retention period and one for investigations and other incidents.

(3) The minimum retention log can be a manual log, matrix, or chart, and should include date, shift or times, brief description of recorded activity and camera/recorder identifier.

(4) The investigation/incident log can be a manual log and should include date and time of the incident, a brief description of the incident, camera/recorder identifier, and a unique investigation identifier (i.e., investigation report number).

(5) The logs for malfunctions and repairs of the surveillance system should include the date, time, and nature of the malfunction, efforts expended to resolve the malfunction, the date of each effort, the reason for any delays in repairs (if applicable), date of repair, and alternative security measures taken (if applicable).

(6) For the surveillance activity log, best practice suggests the operation maintain a daily activity report that lists all proactive, reactive, and regulated functions performed by the surveillance agents.

NIGC Comment to TGWG Guidance

No guidance provided as to length of required retention of logs and forms. The use of “should” rather than “shall” or “must” in the guidance could lead the reader to believe that 543.23(j)(3), (j)(4), and (j)(5) are not required by the MICS but that they are recommended.

TGWG Guidance

§ 543.23 What are the minimum internal control standards for surveillance?

Comparison of July TGWG Submission to 542.23

(k) Audit and Accounting.

(1) Controls must be established for audit and accounting in accordance with MICS 543.19 (What are the minimum internal control standards for audit and accounting?) and the guidance provided in the associated document.

(2) Best practice suggests that each operational area secure daily audit and accounting records, forms, and documents prior to audit. For example a cashier may place records in a locked box for next-day delivery to accounting for audit.

NIGC Comment to TGWG Guidance

It is unclear what and why the accounting department is reviewing surveillance forms and documentation or why records would be placed in a locked box for accounting to audit. Clarity needed for reference to audit under 543.19 since 543.19 does not reference the surveillance department except in the broadest terms (543.19(i)(2)(ii) and 543.19(j)(1)(i)).

§ 543.23 *What are the minimum internal control standards for surveillance for Tier A gaming operations?*

Written Comment (March): It is our understanding that there is the technology that would allow for remote or vpn access to the surveillance system. Therefore, we recommend introducing controls that would provide for the protection of the data on the servers that are a part of the surveillance system comparable to those found in the proposed IT section of the MICS.

Response: The Committee previously reviewed the surveillance section and did not make any recommendations that controls specific to the computerized systems utilized be considered. It is noteworthy that the MICS are intended to represent only the minimum controls necessary to assure the appropriate authorization, recognition and recordation of gaming and gaming related transactions and activities. The IT department has responsibility for systems involved in the collection of gaming related transactional data to facilitate its recognition and recordation. Not least of these functions is the collection of game performance data that revenue audit requires. If the gaming operation has server based games, not only do the IT systems collect operational data but they are also involved in the maintenance of game software directly involved in the determination of winning wagers.

Although the computer systems of the surveillance department are important to the effective operation of the facility, the systems do not rise to the level of those of the IT department and, as a result, the NIGC has determined that there is not sufficient justification to include mandatory controls in the MICS. The comment has no bearing on the transition from 542 to 543.

- (a) Tier A gaming operations must, at a minimum, maintain and operate an unstaffed surveillance system in a secured location whereby the areas under surveillance are continually recorded.
- (b) The entrance to the secured location shall be appropriately secured to prevent unauthorized access.
- (c) Access to the secured location shall be limited to surveillance personnel, designated staff, and other persons authorized in accordance with the surveillance department policy.

- (d) The surveillance system shall include date and time generators that possess the capability to display the date and time of recorded events on video and/or digital recordings. The displayed date and time shall not significantly obstruct the recorded view.
- (e) Surveillance department personnel shall be trained in the use of the equipment, knowledge of the games, and house rules. There must be at least one person readily available at all times with a working knowledge of and the ability to operate the surveillance equipment.
- (f) Each camera required by the standards in this section shall be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled by patrons or staff.
- (g) Each camera required by the standards in this section shall possess the capability of having its picture recorded. The surveillance system shall include sufficient numbers of recorders to simultaneously record multiple gaming and count room activities, and shall record the views of all dedicated cameras and motion activated dedicated cameras.
- (h) Reasonable effort shall be made to repair each malfunction of surveillance system equipment required by the standards in this section within seventy-two (72) hours after the malfunction is discovered.
- (1) In the event of a dedicated camera malfunction, the gaming operation and/or the surveillance department shall, upon identification of the malfunction, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.

(2) The Tribal gaming regulatory authority shall be notified immediately of any required camera(s) that has malfunctioned for more than twenty-four (24) hours (or a shorter period as determined by the Tribal gaming regulatory authority), resulting in coverage or clarity that does not meet the requirements of this part.

(i) *Bingo*. (1) The surveillance system shall possess the capability to monitor the bingo ball drawing device or random number generator, which shall be recorded during the course of the draw by a dedicated camera with sufficient clarity to identify the balls drawn or numbers selected.

Written Comment (March): The issue that needs to be monitored is when human interaction is needed to read the ball draw. This surveillance standard is not possible to comply for linked electronic bingo systems and should be revised accordingly.

Response: The Committee reviewed the proposed standard and had no comment. It is self-evident from the standard that it does not apply to linked electronic bingo games but applies to a game that uses a ball draw, rabbit ears or blower or a board that reflects the numbers selected by an random number generator. This comment has no bearing on the transition from 542 to 543.

(2) The surveillance system shall monitor and record the game board and the activities of the personnel responsible for drawing, calling, and entering the balls drawn or numbers selected.

(j) *Card games*. The surveillance system shall record the general activities in each card room with sufficient clarity to view patrons, dealers and activities on the card table surfaces.

(k) *Player interfaces*. (1) Player interfaces offering a prize payout of \$250,000 or more shall be monitored and recorded by a dedicated camera(s) to provide coverage of:

(i) All patrons and staff at the player interface, and

(ii) The face of the player interface, with sufficient clarity to identify the prize payout line(s) of the player interface.

(iii) The coverage required in paragraphs (k)(1)(i) and (k)(1)(ii) does not require one dedicated camera per player interface if one dedicated camera is able to provide the required coverage for more than one player interface.

(2) The requirements in paragraph (k)(1) do not apply to wide area progressive player interfaces that are monitored by an independent vendor utilizing a linked on-line progressive computer system that have less than a 25% probability of a prize payout of \$3,000,000 or more.

(3) The requirements in paragraph (k) (1) do not apply to in-house progressive player interfaces that have less than a 25% probability of a prize payout of \$250,000 or more.

(4) Probability calculations for paragraphs (k) (2) and (k) (3) shall be performed using a formula provided by the Commission.

Written Comment (March): Put the formula in the regulation; it is our opinion that this formula needs to have the same formal comment period.

Response: The Committee reviewed the proposed standard and one comment was received that NIGC staff addressed. With regard to the formula being included in the regulation, it is anticipated that the complexity of paytables will evolve and the formula may need to be modified or additional calculations provided; Therefore, the ability to readily change the formula needs to be afforded. Furthermore, it is important to recognize that the MICS does not preclude a tribe from developing an alternative method of confirming the 25% probability that is equivalent to the NIGC formula, refer Part 542.3(c) (1). The comment has no bearing on the transition from 542 to 543.

(1) *Cage and vault.* (1) The surveillance system shall monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify individuals within the cage and patrons and staff at the counter areas and to

confirm cash transactions occurring between staff members and between staff members and patrons.

Note (May): In the course of a discussion of another section, it became apparent that there was some confusion as to the meaning of the proposed addition to (l) (1). The standard has been revised to improve clarity.

Revision as a result of on May note:

(1) The surveillance system shall monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify individuals within the cage and patrons and staff members at the counter areas and to confirm **the amount of each** cash transactions occurring between staff members and between staff members and patrons.

(2) Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.

(3) The cage or vault area in which fills and credits are transacted shall be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the chip values and the amounts on the fill and credit slips. Controls provided by a computerized fill and credit system may constitute an adequate alternative to viewing the amounts on the fill and credit slips.

(m) *Count rooms.* The surveillance system shall record a general overview of all areas where currency or coin may be stored or counted.

(n) *Video recording and/or digital record retention.* (1) All video recordings and/or digital records of coverage provided by dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of

seven (7) days, or such longer period that may be required by the Tribal gaming regulatory authority.

(2) Recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel, must be retained for a minimum of thirty (30) days, or such longer period that may be required by the Tribal gaming regulatory authority

(3) Duly authenticated copies of video recordings and/or digital records shall be provided to the Commission upon request.

(o) *Video library log.* A video library log or comparable alternative procedure shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this section.

(p) *Malfunction and repair log.* (1) Surveillance personnel shall maintain a log or alternative procedure that documents each malfunction and repair of the surveillance system as defined in this section.

(2) The log shall state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.

(3) The log must be retained for a minimum of 1 year after the date of the last entry in it.

(q) *Digital Surveillance System Standards* (1) The digital surveillance equipment used to satisfy the surveillance standards in this section shall:

(i) Record and play back video at a minimum of 30 frames per second (FPS), full screen

(4 common intermediate format CIF), in real time.

- (ii) Produce visual resolution that is adequate to satisfy the sufficient clarity standards in this Section.
 - (iii) Have adequate storage capacity to maintain for a period of not less than seven (7) days, all images obtained from the video cameras.
 - (iv) Have a failure notification system that provides audible and visual notification of any failure in the surveillance system or the Digital Video Recording (DVR) media storage system. Alternatively, daily verification of the effective operation of surveillance system and DVR media storage system components is acceptable.
 - (v) Have a media storage system that is configured so that a failure of any single component will result in no loss of data from the media storage system.
- (2) Access, or the ability to access, a digital surveillance system from any location outside of the secure surveillance location, shall be approved by the Tribal gaming regulatory authority. Such transmissions shall be effectively encrypted, firewalled on both ends, and password protected.
- (3) All digital video disks or other storage media produced from the DVR system shall contain the data with the time and date it was recorded superimposed, the media player and the software necessary to view the DVR images, as well as a video verification encryption code (also known as a watermark).
- (4) In the event of a failure of a DVR storage media system (total system failure), the gaming operation should strive to repair or replace the equipment within 8 hours of the failure.
- (5) All DVR equipment must be located in a secure surveillance location(s).