



AUG 18 2006

Via fax and First Class mail

Mr. David Waters
VP Engineering
Nova Gaming
220 N. Main St., Suite 604
Greenville SC 29601

Re: Classification, Nova Gaming Bingo system version 4.3.3.30

Dear Mr. Waters:

This is in response to your letter of July 5, 2006, requesting classification of Nova Gaming's Bingo system, version 4.3.3.30.

This office issued a letter on April 4, 2005, opining that the Nova Bingo system version 4.2.0.12 was Class II. Subsequently, in the ordinary course of business, Nova added features and fixed bugs, and this office opined that subsequent versions 4.2.5.9, 4.2.7.50, and 4.2.9.50 were also Class II because the changes incorporated into those versions left the bingo game's features and method of play unchanged.

Nova is now seeking to place version 4.3.3.30 in tribal casinos. We have reviewed a list from Nova of all of the new features and bug fixes incorporated into version 4.3.3.30 that were not in the previous version, 4.2.9.50. These features and fixes are:

- Support for two new game skins.
- Enhanced tournament mode.
- Support for interface to Multimedia Games' accounting system.
- The "Ready, Set, Go," implementation, which labels the three touches necessary for the game "Ready" (starts the game), "Set" (first daub), and "Go" (second daub and claim) and starts the spinning reels and the rest of the entertaining display only after the bingo game is complete.

In addition, we have reviewed a sample you provided of the Ready, Set, Go graphics and display. Finally, we have reviewed a June 20, 2006, report from BMM test labs, which concludes that none of the modifications incorporated into version 4.3.3.30 alters in any way the game features and play described in our original April 4 letter.

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Accordingly, the opinion expressed in our April 4 letter that Nova Bingo system is Class II applies as well to the Bingo gaming central server file, BGC.EXE, version 4.3.3.30, which has an SHA-1 signature of 2482452236666d9db03041462110d6835f47b659.

If you have any questions, please do not hesitate to call Michael Gross, Senior Attorney, at 202-632-7003.

Sincerely,

A handwritten signature in cursive script that reads "Penny J. Coleman". The signature is written in black ink and is positioned above the typed name.

Penny J. Coleman
Acting General Counsel

cc: Geoffrey Standing Bear, Esq.