



CWYA DʒR JΘNG&ωY DhΘIbH AʒR

CHEROKEE NATION GAMING COMMISSION MEMORANDUM

To: Commissioners

From: Executive Director, Audra Imhoff

Date: July 24, 2026

Re: Agenda Item:

IX. New Business

I.X.J Alternative Standards Class II Mobile Gaming

Commissioners:

CNGC request approval for Proposed Alternative Standards for Class II Mobile Gaming for notice and public comment. Please submit public comments to following: gaming-commission@cherokee.org or 200 N. Water Ave., Tahlequah, OK 74464.

Cherokee Nation Gaming Commission (CNGC) Alternate Standards to 25 CFR Part 547

Item	25 CFR Part 547 Minimum Technical Standards	CNGC Alternate Standard	Justification
1	25 C.F.R. § 547.2 Class II gaming system. All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations. Player interface. Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a Class II game.	*547.2 Class II Gaming System. All components, whether or not technologic aids in electronic, computer, mechanical, or Other technologic form, such as a Class II Mobile Gaming System, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations. Player Interface. Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds such as a Class II Mobile Device, fixed units, etc.), that directly enables player interaction in a Class II game.	Integrity remains unchanged. Class II mobile gaming devices and systems have been added to the list of components included in the definitions of a Class II gaming system and Player Interface to further clarify and define their role.
2	25 C.F.R. § 547.4(b) Approved Gaming equipment and software only. All gaming equipment and software used with Class II gaming systems must be identical in all respects to a prototype reviewed and tested by a testing laboratory and approved for use by the TGRA pursuant to 547.5(a) and (b).	*547.4(b) Approved gaming equipment and software only. All gaming equipment, except for any Class II Mobile Device, and software used with Class II gaming systems must be identical in all respects to a prototype reviewed and tested by a testing laboratory and approved for use by the TGRA pursuant to 547.5(a) and (b). Any Class II Mobile Device used with a Class II Mobile Gaming System must comply with the applicable requirements for such device set by the Federal Communications Commission. The operation shall ensure that any Class II Mobile Gaming occurs only on a Class II Mobile Device utilizing game software that has been reviewed and approved for use by the TGRA.	With the implementation of a Class II Mobile Gaming System, it may be impractical for an Independent Testing Laboratory (ITL) to evaluate player-owned devices such as cell phones and tablets. However, by requiring these devices to be FCC-accredited (or accredited by a comparable authority) and ensuring that TGRA-approved game software is installed on each device, the security and integrity of the gaming system are maintained. The requirement that all game software be identical to the prototype tested and certified by an ITL will remain unchanged

Cherokee Nation Gaming Commission (CNGC) Alternate Standards to 25 CFR Part 547

3	25 C.F.R. § 547. 5(b)(l)(iv) The testing laboratory's written report confirms that the operation of a player interface prototype has been certified that it will not be compromised or affected by electrostatic discharge, liquid spills, electromagnetic interference, or any other tests required by the TGRA;	*547. 5(b)(l)(iv) The testing laboratory's written report confirms that the operation of a player interface prototype, other than a Class II Mobile Device, has been certified that it will not be compromised or affected by electrostatic discharge, liquid spills, electromagnetic interference, radio frequency interference, or any other tests required by the TGRA. Any Class II Mobile Device must comply with the applicable requirements for such device set by the Federal Communications Commission;	Given that an ITL cannot feasibly test all player-owned devices, CNGC relies on the fact that these devices have already been evaluated by an accredited organization, such as the FCC or a comparable authority. This accreditation confirms that the devices meet required standards prior to being made available to the public.
4	25 C.F.R. § 547. 7(d) Player interface. The player interface must exhibit a serial number and date of manufacture and include a method or means to (1)Display information to a player; and (2)Allow the player to interact with the Class II gaming system.	*547. 7(d) Player Interface. (1) Any player interface, except for a Class II Mobile Device, must exhibit a serial number and date of manufacture; (2)At the time Of Class II Mobile Gaming software installation and registration, a Class II Mobile Gaming player Account shall be issued a unique identification number that shall be recorded by the operation. The Class II Mobile Device identification number shall not be transferable to a different Class II Mobile Device; (3) Any player interface must include a method to (i) Display information to a player; and (ii) Allow the player to Interact with the Class II gaming system. (4) Any player interface is restricted to one active log in per session.	EGMs (Electronic Gaming Machine) include a serial number, but these numbers cannot realistically be captured or maintained within CNGC records. To address this, the system will be required to issue a unique identifier to each player-owned account, supplementing the device's physical serial number. The software operating on the player-owned device must display required information while enabling the player to interact with the gaming system. Additionally, the system must ensure that each player interface is limited to a single active login per session.
5	25 C.F.R. § 547. 1 6(b) Disclaimers. The Player Interface must continually display (1)"Malfunctions void all prizes and plays" or equivalent; and (2)"Actual Prizes Determined by Bingo (or other applicable Class II	547. 1 6(b) Disclaimers. (1)Except for Class II Mobile Devices, the Player Interface must continually display (i)"Malfunctions void all prizes and plays" or equivalent; and (ii)"Actual Prizes Determined by Bingo (or applicable Class II game) play. Other Displays for Entertainment Only" or equivalent.	The information required to be presented to the player will be available at the start of the player session. The player must acknowledge this information before being permitted to play on their device.

Cherokee Nation Gaming Commission (CNGC) Alternate Standards to 25 CFR Part 547

	game) play. Other Displays for Entertainment Only" or equivalent.	(2)For Class II Mobile Devices, the information in subsection (b)(1)(i)-(ii), must be displayed prior to initiating a session.	
6	25 C.F.R. § 547.1 6(c) Odds notification. If the odds of winning any advertised top prize exceeds 1 00 million to one, the Player Interface must display " Odds of winning the advertised top prize exceeds 1 00 million to one" or equivalent.	547.1 6(c) Odds Notification. (1)If the odds of winning any advertised top prize exceeds 1 00 million to one, the player Interface (excluding any Class II Mobile Device) must display" Odds of winning the advertised top prize exceeds 1 00 million to one" or equivalent. (2)For Class II Mobile Devices, the information required by subsection (c)(1) must be displayed to the player prior to the start of game play.	The information required in this section will be provided at the start of play, and the player must acknowledge it before their session begins.