

November 10, 2020

Erin Thompson  
Management Analyst  
NM Gambling Board  
4900 Alameda Blvd. NE  
Albuquerque, NM 87113

Dear Ms. Thompson:

Please accept the following comments on the revised rule draft that was recently made available for review.

1. Hybrid game. We appreciate the Board's decision to add a definition of hybrid game and think it will help clarify some of the confusion around those games. We noticed that for bingo, event-style games are allowed to use either a bingo blower or another specific event (basically a seal card) for winner determination. This is great as it gives the operators a wider selection of games from which to choose. However, hybrid games, which are very similar, are limited to the use of a bingo blower to determine winners. We would like to see seal cards also permitted for use with hybrid games. As a result, we encourage the board to modify the definition of hybrid games to include the use of a seal card for winner determination. Please consider the following revision:

**"Hybrid game"** means a bingo event game using pull-tabs as defined in the act which have both instant and non-instant winnings. The non-instant winnings are selected by drawing bingo balls using a bingo blower or by a seal card provided by the manufacturer of the game. This type of game may be referred to as an "event game" or "side game."

2. Pull-tab dispenser. We would like to see the definition of "pull-tab dispenser" modified to permit the dispensing of pull-tab tickets generated by the device at the site. Such a change would eliminate the need for charities to buy and secure rolls of tickets, and it would provide greater accountability and more complete reporting. Please consider the following revision:

**"Pull-tab dispenser"** means a mechanical or electromechanical device that dispenses pull-tabs, printed by a manufacturer off-site or printed on site by the device, or reads a bar-code printed on the exterior of the pull-tab and displays the win or loss status of the pull-tab on a video display.

We hope you will consider our comments and incorporate our suggested changes into the final rule for adoption. If you have any questions, please do not hesitate to contact me.

Regards,

Dale Skitt  
President  
Cactus Bingo Supply  
Cell Phone # 602-320-5975

NATIONAL ASSOCIATION OF FUNDRAISING TICKET  
MANUFACTURERS

180 East Fifth Street  
Suite 940  
Saint Paul, Minnesota 55101  
Tel: 651-644-4710  
[www.naftm.org](http://www.naftm.org)

March 13, 2020

Erin Thompson  
Management Analyst  
New Mexico Gaming Control Board  
4900 Alameda Boulevard NE  
Albuquerque, NM 87113

VIA Email

RE: Proposed changes to NM Rule 15.4.1-15.4.14

Dear Ms. Thompson:

We have taken the opportunity to review the proposed rules as modified by the Board after public comment. We were pleased to see that the Board agreed to clarify “Hybrid games” by adding a definition of those games into the rule draft. However, we would like to see one additional change made to the definition.

In 15.4.1.7 B (1), the Board defines “Bingo” to include certain games of chance “that do not contain an instant win component but contain numbers that must be exposed by the player and the winning combination is exposed by the draw of a bingo ball *or by some other approved specific event*” (emphasis added). The bingo game described could include an event-style game so long as there are no instant winners in the game. The “other approved specific event” is typically a seal card that the manufacturer produces with the game and that is used to determine non-instant winners. The seal card contains the winning number(s) or combination(s) and takes the place of the bingo blower for winner determination.

By comparison, 15.4.1.7 H (3) defines a hybrid game. The primary difference between a hybrid game and a bingo game is that a hybrid game must contain both instant and non-instant winners. However, non-instant winners in a hybrid game may only be determined “using a bingo blower.” We would like to see the definition of “Hybrid game” modified to also permit the use of a seal card for winner determination. We think this can be best accomplished by carrying over the language from the definition of “Bingo.” Accordingly, we suggest that the definition of “Hybrid game” be modified as follows:

**“Hybrid game”** means a bingo event game using pull-tabs as defined in the act which have both instant and non-instant winnings. The non-instant winnings are selected by

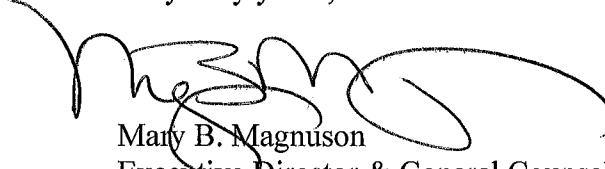
drawing using a bingo blower or by some other approved specific event. This type of game may be referred to as an “event game” or “side game.”

This slight change would give charities the option to offer event games that use a bingo ball draw or a seal card for winner determination. Of course, the Board would have to approve the seal cards prior to use and in so doing, could ensure that the seal cards match the games and all other requirements of law or rule.

Allowing the use of a seal card for hybrid game winner determination will not cause confusion at the game level nor will it cause any regulatory concerns. The distinguishing characteristic between bingo and hybrid games remains the existence (or not) of instant winners. The games are clearly marked so that if there are instant winners in the game, they are identified on the flare, the ticket, or the payout slip (or all of these). Moreover, the vast majority of charities will opt to play hybrid games over similar bingo games to avoid bumping up against the bingo prize limit of \$2500. Having the option of using a seal card or a bingo blower for winner determination in hybrid games will offer players a wider variety of games and, as a result, increase game proceeds for the charitable organizations.

Again, thank you for including a definition of hybrid game in the revised rule draft. We hope you will consider our additional suggestion and revise the definition accordingly.

Very truly yours,



Mary B. Magnuson  
Executive Director & General Counsel



## Arrow International, Inc.

*Helping you accomplish great things!*

October 25, 2019

Erin Thompson  
Management Analyst  
New Mexico Gaming Control Board  
4900 Alameda Blvd. NE  
Albuquerque, New Mexico 87113

Re: Arrow International, Inc.'s Comments on the Proposed Changes to the New Mexico Bingo and Raffle Act Rules 15.4.1 – 15.4.15

Dear Ms. Thompson,

Thank you for the opportunity to provide feedback on the New Mexico Gaming Control Board's ("NMGCB") proposed revisions to Bingo and Raffle Act Rules for NMAC 15.4.1 – 15.4.15 ("Rules"). Arrow International, Inc. ("Arrow") is the world's largest full-line manufacturer of bingo paper, pull-tabs, and related gaming products. With over 50 years of industry experience and facilities across North America and Europe, Arrow provides the highest quality gaming products and the most reliable services in the industry.

Arrow submits the following comments to the NMGCB on the Rules for your consideration:

I. **Rule 15.4.1.7 - Pull-Tab Definition:** Arrow recommends that NMGCB add the following definition to the Rules:

**"Pull-tab"** means gaming pieces that are used in a game of chance that are made completely of paper or paper products with concealed numbers or symbols that must be exposed by the player to determine wins or losses or a gaming piece that is made completely of paper or paper products with an instant-win component that must be exposed by the player on a concealed card and can be used in a speed round for additional winnings utilizing a bingo blower. A pull-tab may contain other material such as ink, glue, latex or other substances provided the letters, numbers or symbols used to identify a winning or losing ticket are printed exclusively on paper or a paper product. A "pull-tab" includes a tip card and can include a progressive pot.

The underlined language above shows what Arrow would recommend that NMGCB add to the Rules and use its regulatory power to clarify how pull-tabs are defined in the Bingo and Raffle Act. These changes are needed to reflect the fact that there really aren't any pull-tabs that in practice are completely made of paper, as manufacturers have to include ink, glue and other substances in pull-tabs to allow the graphics to be displayed and for the physical ticket to hold its form. In addition, this change would clarify that players in New Mexico can receive the benefit of enhanced pull-tabs technology and not be unnecessarily restricted. Finally, adding this language to the Rules would allow New Mexico to align its Rules with how other states interpret similar laws and not be disadvantaged.



**II. Rule 15.4.1.7(DD) - Pull-Tab Dispenser Definition:** Arrow recommends that NMGCB make the following marked changes to the definition of pull-tab dispenser:

**"Pull-tab dispenser"** means a mechanical or electromechanical device that dispenses pull-tabs or reads or generates a bar-code printed on the exterior of the pull-tab and displays the win or loss status of the pull-tab on a video display."

Arrow believes that these changes would benefit the NMGCB by opening the pull-tab dispenser market up to other companies that would not be blocked by patents that potentially protect the devices that are currently filling this space. Making this change will allow other pull-tab dispensers that offer additional benefits of security and tracking to allow the NMGCB to regulate in this area.

**III. Rule 15.4.6.10(G) - Pull-Tab Equipment:** Arrow recommends that NMGCB add the following to the list of clarifying statements regarding pull-tab dispensers in New Mexico:

Pull-tab dispensers may accumulate credits provided a voucher is dispensed that contains the total amount of a player's winnings.

Arrow recommends this language because it would give pull-tab dispensers the ability to reduce paper and give players the option to print one easy-to-use voucher instead of a series of pull-tabs.

Arrow looks forward to participating further in the NMGCB's process to update and modernize the Rules and applauds the NMGCB for their efforts. Arrow is committed to advancing charitable gaming in New Mexico and looks forward to continuing to work with the NMGCB.

Please let us know if you have any questions or if there is anything else that we can do to assist you with your efforts.

Sincerely,



Jennifer Gehrlein  
General Counsel

