

# **Executive Summary of Changes for “GLI-33 V2.0, Standards for Event Wagering Systems” Public Comment Draft, Issued June 15, 2026**

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Below is an Executive Summary of the proposed changes in “GLI-33 V2.0, Standards for Event Wagering Systems” public comment draft:

- Reorganized and restructured document into more consumable chapters and sections, providing better distinction among the major technical areas of Platforms/Systems, Player Accounts, Remote Wagering, Retail Wagering, and General Wagering Requirements.
- Incorporated requirements based upon industry best practices.
- The document has been reorganized to provide better clarity between technical requirements, which can be evaluated and certified, and internal controls, which can be audited.
- Added and updated terminology throughout the document to align with current event wagering operations, including updated usage of Event Wagering System, Wagering Platform, Player Account Manager, Remote Player Device, Player Application, Retail Wagering Terminal, OTC Wagering Terminal, Geolocation Solution, and related terms.
- Added reference to the GLI Gaming Security Framework (GLI-GSF) which will house the technical security controls and testing requirements for these systems.
- Incorporated limited alignment with widely-accepted jurisdictional and international standards.
- Added a “Use of Mechanisms” section to clarify that a required mechanism may be a critical component, documented process, operational procedure, technology, or a combination of approaches, with compliance evaluated based on effectiveness rather than a single prescribed implementation. (S 1.4.3)
- Expanded laboratory testing provisions to address source code access, compilation verification, additional testing when components are integrated with the Event Wagering System, and use of an adopted change management program to determine modification testing scope. (S 1.5.1)
- Reorganized Chapter 2 into Platform/System Requirements, focused on system clock, control program verification, wagering communications, system controls and overrides, information retention, and reporting. (chapter 2)
- Revised wagering management requirements to cover communication techniques, the ability to disable or suspend wagering activity, and wager record override capabilities such as redeeming, settling, voiding, or cancelling wagers. (S 2.4)
- Expanded information retention requirements to cover wager records, wagering events and markets, contests/tournaments, player accounts, bonusing/promotional offers, retail wagering terminals, system significant events, system verification records, and user accounts. (S 2.5)
- Revised reporting requirements to include general reporting expectations, wagering revenue reports, operator liability reports, future event/market reports, player account activity reports, and system significant event and alteration reports. (S 2.6)
- Moved and substantially expanded player account requirements into a dedicated chapter covering account registration and verification, account management, limitations, time-outs, suspensions, and bonusing/promotional offers. (chapter 3)
- Expanded registration and verification requirements to address collection of PII, KYC Solutions, identity verification, identity validation, location detection permission, and activation prerequisites. (S 3.2)
- Added mandatory multi-factor authentication (MFA) requirements at account creation, including recognized authentication factors and regulatory-body flexibility for alternative factors or time periods. (S 3.2.5)
- Expanded player account management to address authentication credentials, financial transactions, account statements or transaction logs, account updates, account closure, and inactive player accounts. (S 3.3)

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- Expanded responsible gaming tool requirements for limitations, time-outs, and suspensions, including player- and operator-initiated actions and restrictions on wagering or financial transactions during applicable periods. (S 3.4)
- Updated bonusing/promotional offer requirements to address player cancellation of participation and completion of offer terms, including treatment of restricted bonusing/promotional credits. (S 3.5)
- Replaced the prior Wagering Device Requirements chapter with separate chapters for Remote Player Device and Application Requirements and Retail Wagering Terminal Requirements. (chapters 4 and 5)
- Expanded Player Application requirements to address application identification, validation, compatibility verification, secure communications, application errors, client-server interactions, application content, and cookies. (S 4.2)
- Added remote player access requirements addressing account-based wagering, MFA for login, post-login information, player access to operator display content, and inactivity re-authentication. (S 4.3)
- Added device and application integrity, monitoring, and security requirements, including persistent device identification, monitoring for multiple devices or accounts, device/application integrity and attestation, and application runtime protection. (S 4.4)
- Expanded geolocation requirements into a dedicated section addressing Geolocation Solution requirements, triggering actions, checks/logging/failures, data sources and cross-validation, spoofing/proxying/evasion detection, geolocation integrity risks, and beacon technology. (S 4.5)
- Reorganized retail wagering requirements into a dedicated chapter covering Self-Service Wagering Terminals, OTC Wagering Terminals, and Retail Wagering Terminal Management. (chapter 5)
- Revised Self-Service Wagering Terminal requirements, including treatment of kiosks as self-service wagering terminals and Gaming Devices acting as self-service wagering terminals. (S 5.2)
- Revised OTC Wagering Terminal requirements, including attendant interface requirements, touch screen displays, printer requirements, wager record handling, and wireless OTC terminal requirements. (S 5.3)
- Added Retail Wagering Terminal Management requirements for monitoring, terminal identification, integrity of protocol communications, and terminal transaction requirements. (S 5.4)
- Added Player Interface Requirements addressing player interfaces, adaptive displays, alternating displays, and simultaneous inputs and outputs. (S 6.2)
- Expanded wagering display and information requirements covering wagering rules, dynamic wagering information, rakes/commissions/fees, and event wagering jackpots. (S 6.3)
- Expanded wager placement requirements to cover free bet/demo mode, player resource features, fixed odds changes during wager placement, layoff wagers, wager records, and wagering period close controls. (S 6.4)
- Added or expanded results and payment requirements for results display, early settlement features, and wager redemption. (S 6.5)
- Added a dedicated Peer-to-Peer (P2P) Wagering section addressing P2P wagering, pot/pool displays, and player reporting of suspicious players. (S 6.6)
- Added a dedicated Exchange Wagering section addressing market maker wagers, wager formalization, best execution, and live exchange wagering delays. (S 6.7)
- Added Spectator Wagering Requirements for wagering tied to host-player activity, including wager and player display, linked wagering, performance-based wagering, and related disclosures. (S 6.10)

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- Reorganized Appendix A and restructured the internal controls into clearer sections for Internal Control Procedures, General Operating Procedures, Operator Display Content, Player Account Controls, Wagering Procedures and Controls, Integrity/Collusion/Fraud/AML-ATF Controls, and Geolocation Solution Controls.
- Added or expanded internal control requirements for third-party service providers, prohibited or restricted persons, workstation access controls, test accounts, operator reserves, protection of player funds, taxation, complaints/disputes, chat features, responsible gaming, PII security, payment processing security, and use of algorithmic processing technologies. (Appendix A)
- Expanded operator display content requirements, including wagering rules, player protection information, terms and conditions, privacy policies, bonusing/promotional offer terms, contests/tournaments, and multi-language event wagering content. (A.4)
- Expanded player account controls, including manual registration and verification processes, one-account-per-player controls, fraudulent account procedures, player funds maintenance, responsible gaming tools, player account and device monitoring, and player loyalty programs. (A.5)
- Expanded wagering procedures and controls for wagering events, odds/payouts, outcome management, statistics/line data, live-event wagering, suspending markets, risk management, wager voiding/cancellation, past-post prevention, results verification and settlement, retail wagering operations, and sponsored players for P2P wagering. (A.6)
- Expanded integrity, collusion, fraud, and AML/ATF controls to address integrity and compliance programs, integrity monitoring and response, regulatory notification and reporting, AML/ATF procedures, and recordkeeping. (A.7)
- Added Geolocation Solution Controls for audits, accuracy radius, geolocation mapping, maintenance, fraud monitoring, reporting and analytics, and operator responsibilities for geolocation. (A.8)
- Revised Appendix B to remove the technical security controls and point to the GLI-GSF for Integrity and Security Assessments
- Expanded the Glossary of Key Terms and added or revised definitions for current wagering, account, security, geolocation, payment, exchange wagering, P2P wagering, and remote wagering terminology.
- Added various notes to improve clarity of requirements, and to better document known conditions or restrictions.
- Made various grammatical changes throughout the document to improve clarity and readability.