

STANDARD INTERPRETATION No. 13-012

Game Design: Online and Land-Based Game Themes

Relevant Standard(s):	2.8, 10.1, 10.14
Application:	All Sectors
Issue:	
<p>Do online and land-based games based upon the same theme have to play the same, have the same math, etc.? In other words, if a game supplier were to port an existing land-based game to the online environment, is the expectation that each version of the game would have to play the same and have the same math?</p>	
Response:	
<p>Collectively, standards 2.8 (Requirement 1), 10.1 (Requirements 3 and 4), and 10.14 do permit differences in probability of game outcomes and their respective features and actions, provided that the differences are disclosed to the player.</p> <p>The determination as to whether disclosure is required will be based on the circumstances of each case. The determining factor will be the likelihood that in the circumstances a player could be misled by the differences between the land-based and internet game. The intent behind each of these standards is to ensure that players are not misled, which should guide your decision as to whether or not disclosure is necessary.</p>	
Relevant Standard Excerpt(s):	
2.8 Game designs and features shall be clear and shall not mislead the player.	
Requirements – At a minimum:	
<ol style="list-style-type: none"> 1. Where a game simulates a physical device, the theoretical probabilities and visual representation of the game shall correspond to the features and actions of the physical device, unless otherwise disclosed to the player. 2. Game design shall not give the player the perception that speed of play or skill affects the outcome of the game when it does not. 3. After the selection of game outcome, the game shall not make a variable secondary decision which affects the result shown to the player. If the outcome is chosen that the game will lose then the game shall not substitute a particular type of loss to show to the player (i.e. near miss). 4. Where the game requires a pre-determined pattern (for example, hidden prizes on a map), the locations of the winning spots shall not change during play, except as provided for in the rules of play. 5. Games shall not display amounts or symbols that are unachievable. 6. Games shall not contain intentionally programmed subliminal messaging. 7. Where games involve reels: <ol style="list-style-type: none"> a. For single line games, jackpot symbols shall not appear in their entirety more than 12 times on average, adjacent to the pay-line, for every time they appear on the pay-line; b. For multi-line games, jackpot symbols shall not appear in their entirety more than 12 times, on average, not on any pay-line, for every time they appear on any pay-line. 	

8. Free-to-play games shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games played for money.
9. The denomination of each credit shall be clearly displayed on game screens.

10.1 The player shall be provided with accurate information to enable the player to make informed choices.

Requirements – At a minimum:

1. For each game, the theoretical payout shall be provided:
 - a. For games that include progressive awards, limited time awards, metamorphic elements or game-within-a-game awards, the variable contribution of such awards to the theoretical payout percentage shall be clearly disclosed;
 - b. For games which have different theoretical payout percentages for different betting options, the lowest theoretical payout percentage of all betting options shall be disclosed, as a minimum;
 - c. For games which have skill and/or strategy components, the theoretical payout percentage shall be calculated using a standard/published strategy. If there is no such standard/published strategy, the theoretical payout percentage shall be calculated using a blind strategy (random choice).
2. Games with elements of skill or strategy shall either disclose the optimal strategy or provide other information to the player that is sufficient to derive the optimal strategy.
3. For any top award that has a probability of less than 1 in 17 million to win, the probability shall be disclosed to the player.
4. For any other award that has a probability of less than 1 in 34 million to win, the probability shall be disclosed to the player.

10.14 The probability of game outcomes in virtual games shall be the same as in the associated live game (e.g. card games), unless the differences are set out in the rules of play and communicated to players.

This interpretation is provided for informational purposes only and does not constitute legal advice. The interpretation relates to a specific set of circumstances and the standards, laws and regulations in force at the time the interpretation was issued; however, it is not an exhaustive or definitive interpretation of the standard(s) referenced herein.

The AGCO has established the Standards Interpretation Protocol, which acts as a single point of contact for inquiries from the gaming industry related to the interpretation of the Standards. For more information, please contact the AGCO's Customer Service Department at 416 326-8700 (in the GTA) or 1 800 522-2876 (toll free in Ontario).