



## MEMORANDUM

**Date:** June 15, 2009

**To:** All Bingo Hall HCAs and Bingo Hall Owner/Operators operating under the Bingo Revenue Model

**From:** Tom Mungham, Deputy Registrar  
Director, Licensing and Registration Branch  
Alcohol and Gaming Commission of Ontario

**Subject:** Attendance-Based Prize Boards

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I am writing today regarding attendance-based prize boards. The Alcohol and Gaming Commission (AGCO) recently received an inquiry on whether attendance-based prize boards would fit within the framework of the Bingo Revenue Model (BRM).

Prior to the launch of the BRM, the AGCO had entertained requests to allow attendance-based prize boards; however, it was not permitted as set prize boards were required at the time with no provision for any variance due to poor attendance once a licence had been issued. With the introduction of greater flexibility, I am pleased to remind you that attendance-based prize board does fall within the BRM.

What is the potential benefit for adopting an attendance-based prize board approach? Simply, when utilized correctly, attendance-based prize boards may offer HCAs and Halls an additional safeguard from operating any given session at a loss due to low attendance.

It is common practice that the make-up of a bingo program incorporates guaranteed and variable prizes. The guaranteed portion of the program may be at risk of operating at a loss due to a fluctuating attendance base. In contrast, games with a variable component, if structured accordingly, are not disadvantaged due to a fluctuating attendance base as they are designed with safeguards to mitigate against any losses. Attendance-based prize boards may be considered to address the guaranteed portion of your prize board while, in concert, still offering variable prizing.

If HCAs, through consultation with their Hall Owner/Operator, are contemplating the implementation of attendance-based prize boards, at minimum, the following controls must be implemented prior to submission to the Licensing Authorities for review to ensure that the guaranteed prize board scales are clearly defined in the rules of play:

- Breakdown of the set maximum payout based on attendance range. For example--prize board capped at \$2,000 for an attendance base of 1-to-50; \$2,500 for a base of 51-to-100, etc.
- Set programs are to be submitted at the time of licensing that clearly identify the attendance range. As always, these programs must be available to all patrons at the Hall and it is further suggested that they be posted as well.
- Set timelines to coincide with the attendance count must be identified to determine the prize board scale. HCAs must also have policies in place detailing how they will deal with customers that purchase their books after the set timeline as they could potentially affect the range.

As you are aware, since the launch of the BRM, greater onus rests with the Licensee and the Operator to ensure that they work within the prescribed framework as there are no longer Terms and Conditions for specific game types under the BRM. As such, all rules of play for any game offered within your program must be fully descriptive at the time of licensing to make certain that the honesty and integrity of the game/event is maintained.

Please feel free to contact Gary White at 416-326-0436, if you have any questions or concerns.

Yours truly,



*TC* Tom Mungham  
Director, Licensing and Registration Branch

cc: Don Bourgeois, General Counsel, Director, Legal Services  
Kathy Klas, Director, Sector Liaison Branch  
Gary White, Assistant Deputy Registrar, Licensing & Registration  
Municipalities