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VIA EMAIL

February 3, 2020

[applicant information]

Re: Request for Records: BCLC File 20-010

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British Columbia Lottery Corporation (BCLC) writes further to your January 10, 2020 request (received January 13, 2020) under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter dated January 20, 2020.

You requested:

"Please provide the coding used for programming of the Random Number Generator (RNG)."

Due to stringent controls that protect the security and integrity of gaming, BCLC is not able to share coding for random number generators (RNGs). As such, BCLC is withholding the requested information in its entirety under sections 15 and 21 of FIPPA.

Below are the reasons for withholding information under each of the exceptions to disclosure noted.

**Section 15 (harm to law enforcement)**

If disclosed, the information withheld under this section could reasonably be expected to harm the integrity of gaming in B.C and harm the security of any property or system, including BCLC's computer systems.

**Section 21 (harm to business interests of a third party)**

If disclosed, the information withheld under this section is harmful to third-party business interests. It consists of third-party proprietary commercial information. Disclosure could reasonably be expected to significantly harm the competitive position or the negotiating position of the third parties.

The full text of sections 15 and 21 can be found at:  
[http://www.bclaws.ca/Recon/document/ID/freeside/96165\\_00](http://www.bclaws.ca/Recon/document/ID/freeside/96165_00)

BCLC wishes to provide general information about RNGs to assist your understanding.

BCLC uses many different types of RNGs, depending on the gaming channel. By way of example, the following information describes how RNGs are used in the lottery gaming channel. National draws, including Lotto 6/49, Lotto Max and Daily Grand, are conducted at the Interprovincial Lottery Corporation in Toronto, Ontario, using RNG software.

BCLC regional draws, including BC/49, BC50/50, Keno, Pacific Hold' Em Poker, Poker Lotto and Extra, are conducted at the BCLC head office in Kamloops, B.C., using RNG draw machines that combine software and hardware RNG algorithms.

Third-party Accredited Testing Facility experts have tested and certified RNGs for randomness. External third-party auditors have reviewed the RNGs randomness and security controls surrounding the draw machines and draw processes. All gaming equipment used at BCLC is certified, to applicable Technical Gaming Standards, by BCLC's regulator, the Gaming Policy and Enforcement Branch.

To ensure the ongoing integrity of games, third-party experts continue to test and certify the randomness of the RNGs and surrounding controls. In addition, certain draw machines run self-tests to ensure integrity. Third-party auditors are present during draws for national games, BC/49 and Extra to verify integrity of the results.

More information about how lottery winning numbers are drawn is available here:

<https://corporate.bclc.com/what-we-do/lotto/about-lotto/how-are-lottery-numbers-drawn.html>

This response to your request will be published a minimum of five business days after release at:

<https://corporate.bclc.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me via e-mail at [clantos@bclc.com](mailto:clantos@bclc.com) or at (250) 377-2076.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia  
P.O. Box 9038, Station Provincial Government  
Victoria, BC V8W 9A4  
T (250) 387-5629 F (250) 387-1696  
Email [info@oipc.bc.ca](mailto:info@oipc.bc.ca) Online [www.oipc.bc.ca](http://www.oipc.bc.ca)

Sincerely,  
[original signed by]

Candice Lantos  
Senior Freedom of Information Analyst