Georgia COAM (Class B) Primer

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Abstract

This document explains the current Georgia COAM regulations as of February 2026. It also provides guidance for those new to this unique market.

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01 Basics of COAM

01.01 Glossary

(Ref: O.C.G.A § 50-27-70; O.C.G.A § 50-27-84; O.C.G.A § 50-27-87; O.C.G.A § 50-27-102)

- **COAM** = Coin Operated Amusement Machines
  - **Class A:** Classic arcade-style games like skee-ball and claw games.
  - **Class B:** Usually resemble casino games (slots in particular), and have a few key attributes:
    - Skill-based, cannot be 100% chance
    - Credits are carried over from game to game
    - Dispense credits in some form that must be redeemed for merchandise on-location
- **Skill Test**
  - A defining feature of skill-based games is that all Wins are gated behind Skill Tests (see below)
- **Hand Count**
  - Each play on a GA COAM machine adds to the Hand Count, which is used in determining cash-out values
- **Game Pack**
  - COAM games are multi-game systems, usually consisting of 5–6 titles per pack that may be freely switched between from a central game select screen
- **Cabinet**
  - A catch-all term for the physical hardware the Game Pack is installed on
- **Site Controller**
  - An on-site device that all cabinets communicate with to handle Intralot reporting, game commissioning, and other related tasks
- **SAS** = Slot Accounting System
  - A common communication protocol used by Intralot to monitor gaming for legal, regulatory, and taxation purposes

Governance

- **GLC** = Georgia Lottery Commission
  - The GLC oversees the regulation of COAM games in Georgia and retains 13% net receipts for the state
- **Intralot**
  - Contracted by the GLC to oversee the daily operation, security, accounting, and record keeping of all COAM games in Georgia

Legal Entities

- **Publisher**
  - The company that produces the games and cabinets. A Publisher can not also be an MLH or LLH. The Publisher can not profit directly from their games beyond the initial sale to an MLH
- **MLH** = Master License Holder
  - A legally mandated buffer between the Publisher and LLH. The MLH purchases games from the publisher and leases them to the LLH, and is entitled to 43.5% of net receipts. An MLH can not be the exclusive supplier of a Publisher's products to LLHs.
- **LLH** = Location License Holder
  - Owns the retail space where the games are located. The LLH leases games from the MLH, and is entitled to 43.5% of net receipts

01.02. Skill Test

(*Ref: O.C.G.A § 16-12-35*)

What Defines a Skill Test

There are few specific items that determine if gameplay is properly skill-based:

- All Wins MUST be gated behind a Skill Test
  - The sequence is ALWAYS: **Bet → Skill → Award**
  - The Win Award may encompass an entire Bonus feature, so long as there has been a Skill Test between the Bet and the Award
  - The reel spin presentation may come before or after the Skill Test, though it is nearly always placed before the Skill Test
- The player must be required to take an action to determine success or failure
  - If there is no player interaction, it is not skill-based
- It must be possible for the test to fail
  - If there is no way to lose or fail, then it is not a Skill Test
- The award amount is predetermined as normal
  - The Skill Test result is pass or fail only, it does not impact the prize amount
- These guidelines apply to all prize awards, including regular plays, bonus games, jackpots, progressives, etc.

> **In Summary**
>
> - All wins gated behind a Skill Test - Skill Tests require player interaction - Skill Test results are pass/fail

Features Common to Skill Test Presentations

- Pressing the *Play* button without solving the Skill Test will do nothing
- The *Bet Level*, *Max Bet*, *Exit*, and *Help* buttons are also disabled until the Skill Test is completed
- If the game is AutoPlaying, the AutoPlay will stop when a Skill Test needs to be solved
    - The game may resume AutoPlay following the Skill Test evaluation, but it is not required
- The potential Win Line or combination is highlighted, so it is clear to the player which potential Win is being evaluated
    - This may also involve deemphasizing symbols not involved in the potential Win, but this is not required
    - This may not apply to Overlay Skill Tests that cover the reels
- There may be multiple Wins present; in these cases, the Skill Test is applied to the highest Win
    - Correctly solving the Skill Test awards **ALL the Wins**
    - Failing the Skill Test awards **NONE of the Wins**
    - This must be made clear in the Help Pages
- Hinting at the correct answer is allowed. Some examples of hinting include:
    - Making the correct option a different color
    - Adding particles or other effects to the correct option
    - Animating the correct option
    - Applying a label to the correct option

01.03 Common Skill Tests

These are quick sketches of the most common Skill Tests used in GA COAM, included here for reference. Refer to individual specs for specific details about our implementation of these features.

Reel Nudge

- After the reels stop spinning, if there is a potential Win, one of the reels will be positioned one stop too high or too low to complete the Win
- Arrows will apprear at the top and bottom of every reel allow the Player to nudge a reel up or down by one reel stop
- After ONE reel is nudged ONE stop, the Skill Test will be evaluated
- Though it is uncommon in Georgia COAM, some Nudge games can be configured with the nudge arrows present after every spin, even if there is no potential Win
    - In these cases, pressing the *Play* button without solving the Skill Test will start the next game
    - After ONE reel is nudged ONE stop, the Skill Test will be evaluated as a failure

- The nature of how Nudges work means they are best used in single-line, three-reel games
- The earliest Georgia COAM games were Nudge games, and many players still prefer them over any other Skill Test type

Symbol Select

- After the reels stop spinning, only if there is a potential Win, one of the symbols involved in that Win will be obscured from the Player
- The Player will be presented with two symbols to choose from, one of which will complete the Winning combination and award the Win
- After one of the symbols is selected, the Skill Test is evaluated

Overlay

- The Skill Test will be shown on an overlay graphic that will overlay the reels, rather than being shown on the reels
- This is a broad category that can include nearly any conceivable mini-game as a Skill Test. Some examples include:
  - Choosing correctly between two or more items
  - Matching colors or numbers
  - Finding a hidden picture
  - Solving a maze
  - Repeating a pattern (aka "Simon")
- Since Overlay features do not need to interact with the reels or symbols, they can be applied to many different games with minimal effort
- They risk interrupting the flow of play if they are not carefully designed

01.04 Hand Count

(Ref: O.C.G.A § 16-12-35)

The concept of a Hand Count is particular to a few skill-based markets, including Georgia.

- The current Hand Count must be visible to the player during normal play as well as in the Game Selection screen
- The Hand Count starts at 0 when credits are first added to the machine
- Every play adds 1 to the Hand Count
- When cashing out, the maximum amount that can be collected is [Hand Count] × $5
  - Cash-out increment and minimum Cash-out Amount can be set to anything from $0.01 to $5
  - Any remainder is left on the cabinet as credit

- The number of Hand Counts cashed out will be subtracted from the current Hand Count upon cashing out
- If the Credits on the machine drop below the minimum bet level, a Hand Count Reset timer will begin (the length of the countdown can be set in the settings, and should default to 30 seconds
- When the countdown reaches 0, the Hand Count resets to 0
- If more Credits are added to the machine before the countdown ends, the countdown stops, and the Hand Count is retained

Hand Count Cash-Out Examples:

A player has $42.50 in credit and 9 Hand Count:

- The most they could cash-out under any circumstance is $45
- If the Cash-out increment is set to $5, they will actually cash-out $40; $2.50 will remain on the machine and the Hand Count will be reduced to 1
- If the Cash-out increment is set to $1, they will actually cash-out $42; $0.50 will remain on the machine and the Hand Count will be reduced to 0

Hand Count Reset Examples:

A player has $0.40 in credits and the Minimum Bet for the game is $0.25: - Playing a game with a Bet of $0.16 or more will drop the current credits below the Minimum Bet, which will trigger the Hand Count Reset countdown: - If enough credits are inserted before the countdown reaches 0, the Hand Count will be retained - If the countdown reaches 0, the Hand Count is reset to 0 and any credits left on the machine remain

> **In Summary**
>
> - Hand Count starts at 0; add 1 Hand Count per play - Player can cash-out only $5 per Hand Count - For every $5 cashed-out, subtract 1 Hand Count - Credits falling below minimum Bet Level triggers Hand Count Reset countdown - If no credits are added before countdown ends, Hand Count resets to 0

01.05 Cash-Out Requirements and Limitations

(Ref: O.C.G.A § 16-12-35; O.C.G.A § 50-27-71)

Cash-out in Georgia COAM has several specific limitations:

- A COAM machine **cannot** dispense cash

> **Important**
>
> - Prior to July 1, 2026: - A COAM machine can dispense vouchers or gift cards - Must be redeemed on-site only - Such vouchers cannot be redeemed for cash, firearms, alcohol, or tobacco - Other prizes of equivalent value are also permitted - After July 1, 2026: - Prepaid gift cards and lottery products will be the ONLY allowed form of redemption - Gift cards will be able to be used for any legal purchase at any location that accepts them

- Can cash-out no more than $5 per Hand Count
- Each Hand Count is treated as an individual game with a $5 maximum award. Because of this, there are no taxable wins in Georgia COAM
  - Put another way, a $1500 cash-out isn't a $1500 win, it is 300 × $5 wins.

01.06 Location Requirements

Ref: O.C.G.A § 50-27-84

There are particular requirements that locations must meet to qualify for a COAM license.

- May be any retail location that does not primarily sell alcohol, firearms, tobacco, or pornographic/adult content; and primarily sells merchandise rather than services
  - ***NOTE:** A rule change is in the works to allow for COAM machines to be placed in bars*
- COAM revenue cannot exceed 50% of the total revenue for the location
- There are a maximum of 9 COAM machines per site

01.07 Other Regulations

Networking

- COAM game cabinets are not allowed to be networked together
  - Progressives can not be shared between cabinets, nor can they interact in any other way
  - Games that are a part of the same Game Pack may share Progressives within that single cabinet

SAS Support

- Our separate SAS Requirements document includes the full list of required SAS Long Polls, Meters, and Events
- The Primary SAS port may only be used by Intralot to connect the Cabinet to their Site Controller

- The Site Controller will confirm the identity of the Game Pack by running a LP21 (ROM Signature) and comparing the results to their records. If this check fails, the Game Pack will be disabled
- The Secondary SAS port is allowed to be used by kiosk payment systems
  - Secondary SAS is disallowed from sending LP01 (Disable Play) and LP02 (Enable Play) commands

01.08 Other Considerations

These are not explicit regulatory requirements, but rather guidance we have received from interactions with regulators.

Table Game Imagery Disallowed

- Gambling imagery—craps tables, roulette wheels, playing cards, casino backgrounds, and so on—is not allowed
- DO NOT use card suits and face cards in designs
- Traditional royals (A, K, Q, J, and 10) are allowed so long as they do not look like cards and are not paired with a suit
- Dice are allowed

Cash Labels and Imagery Disallowed

- There can be no messaging, implicit or implied, that the game will dispense actual cash
- DO NOT use "Cash Out" in-game or on buttons
  - Use "Collect" instead
- DO NOT label anything as "Cash"
  - Use "Credits" instead
- Dollar signs and cash values on credit amounts and prizes are OK
- Dollar sign and gold bar or similar reel Symbols are OK
- Bank and cash themes are OK

02 Other Considerations

Designing COAM games requires a different mindset and considerations than traditional Class 2 and Class 3 slot games.
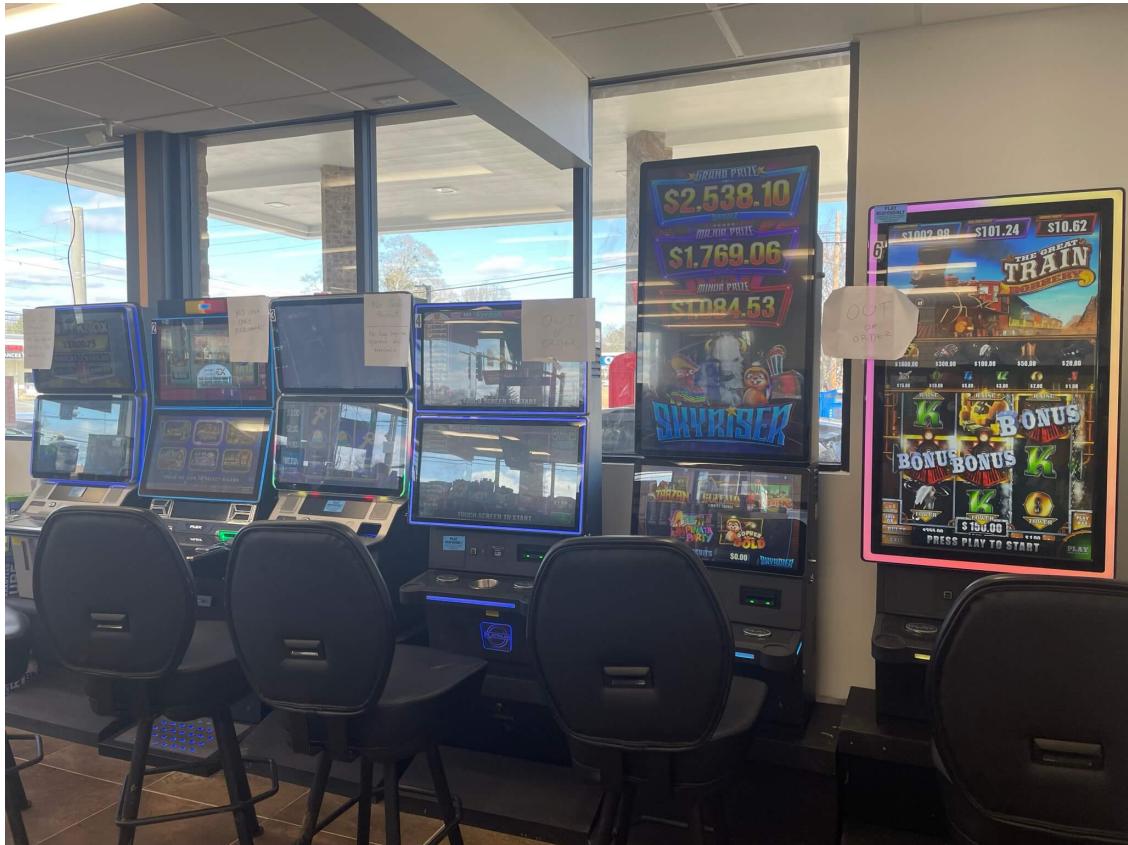
02.01 Key Differences from Casinos

- Casinos are destinations, located in and adjacent to resorts, fine dining, and hotels; players travel specifically to visit them and play their games. COAM games are located in gas stations and restaurants, often in back rooms and dark corners.
- The average COAM player—in as much as such a thing exists—is markedly different from the average casino player:
    - Many are only seeking a momentary diversion, a chance to blow off a little steam and a chance to pocket a little something extra; many do not specifically set out to play
    - They tend to be younger, are largely working class, and are more likely to be male when compared to casino players
    - Many speak English as a second language; some do not speak English at all
- Sound is a big part of the casino experience, but in gas stations and other retail establishments, constant loud music and sounds are not generally welcome
    - We can't assume that the sound will be turned up, let alone turned on
    - If there is no way to mute the sound in a game, many locations will simply unplug the speakers
- Because of where COAM games are located, there are specific complicating factors to take into account when designing COMA games and cabinets
    - Screens can be difficult to easily see through the glare from overhead lights, and may be washed out by outside light, depending on how the location is set up
    - Maintenance of the machines is the responsibility of the MLH, who may not be available immediately if there is a problem
    - These locations are unlikely to have any sort of security on-premises
    - The space is often limited, with low ceilings and cramped seating

02.02 What Attracts and Sustains COAM Players

In our hard won experience, these factors can make the difference between a success and a failure:

- **Progressives**: COAM players chase Progressives just like casino players. As a reminder,
    - Game packs with shared Progressives should feature them prominently on the top of the game select screen, as well as in each game.
    - Games with individual Progressives should show
- Simplicity: COAM games and their skill features need to be quick and easy to grasp
- Entertainment Value:
- Familiarity:
- Fewer small wins
- Fair math Most COAM games have their pay tables displayed on the screen at all times.

Players are accustomed to being able to size up a game at a glance, and are unlikely to look in the Help screens.

This image—of a fairly average recent COAM installation—illustrates several of these points.

§ 50-27-70