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# Georgia COAM (Class B) Primer

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## Description

The intended audience for this document is experienced slot developers, designers, and decision-makers who need to quickly get up to speed on Georgia COAM. Toward that end, included are:

- A plain-English description of current Georgia COAM regulations as of February 2026 (Sections 01 & 02)
- Guidance and insight into this unique market (Section 03)
- Links to important regulatory documents (Section 04)

### Important

**This document is not legal advice**, nor is it meant to be all-inclusive. It is intended solely as an introduction and source of general information and market context. Check all up-to-date laws and regulations before taking any action.

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## 01 COAM Regulations

### 01.01 The Basics

*Ref: GA Code § 16-12-20 (2021) • O.C.G.A. § 50-27-70 (2025) • RU 13.1 (2019) • RU 13.3 (2019)*

- **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 (*see 01.02*)
    - Credits are carried over from game to game within a single session
    - Award lottery products or credits that must be redeemed on-location (prior to July 1, 2026)
    - Award lottery products of prepaid gift cards (after July 1, 2026; *see 01.04*)
- **Skill Test**
  - A defining feature of skill-based games is that all Wins are gated behind Skill Tests (*see 01.02*)
- **Hand Count**
  - Each play on a GA COAM Cabinet adds to the Hand Count, which is used in determining cash-out values (*see 01.03*)
- **Game Pack**
  - COAM Cabinets are multi-game products sold as Game Packs. Each pack typically contains 5–6 titles that can be freely switched between using a central Game Select screen.

### Cabinets

*Ref: RU 13.1 (2019); Standards for the Secured Compartment*

- **Cabinet**
  - An inclusive term for the physical hardware and the Game Pack installed on it
- **Hard Meters**
  - COAM Cabinets are required to have two mechanical Hard Meters installed; one tracking coin-in, the other tracking coin-out, both in \$1 increments
- **Secured Compartment**
  - COAM cabinets must have a secured compartment that houses the logic board and Hard Meters

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## Governance

Ref: O.C.G.A. § 50-27-101 (2025) • RU 13.1 (2019)

- **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
- **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 (*see 01.06*)
  - A common communication protocol used by Intralot to monitor gaming for legal, regulatory, and taxation purposes
  - Ultimately, the flow of information is: **Cabinet** → **Site Controller** → **Intralot** → **GLC**

## Legal Entities

Ref: O.C.G.A. § 50-27-84 (2025) • O.C.G.A. § 50-27-87 (2025) • O.C.G.A. § 50-27-102 (2025) • RU 13.1 (2019)

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

## 01.02 Skill Test

Ref: GA Code § 16-12-35 (2021)

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## What Defines a Skill Test

There are specific, legally mandated qualities 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
  - You can wrap an entire bonus feature inside the Award step, as long as a Skill Test happens between Bet and that 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
  - That action must be part of the flow of play, not a menu or other unrelated action
  - 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.

## 01.03 Hand Count

Ref: GA Code § 16-12-35; (2021) • RU 13.1 (2019)

The concept of a Hand Count is particular to a few skill-based markets, including Georgia. The Hand Count caps the award of each “hand” at \$5, which limits tax complexities as well as the viability of many forms of cheating.

- 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 Cabinet
- 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 Cash-out Amount can be anything from \$0.01 to \$5
    - Not all Game Packs allow this to be changed; most that do default both to \$5
    - Any remainder is left on the Cabinet as credits
    - The number of Hand Counts cashed out will be subtracted from the current Hand Count
    - If the cash out increment is set to less than \$5, for the purposes of subtracting Hand Counts, round up to the next \$5 increment

### Example

A player has \$42.50 in credit and 9 Hand Count.

- If the Cash-out increment is \$5:
  - They will actually cash out \$40 (a multiple of \$5)
  - \$2.50 will remain on the Cabinet
  - The Hand Count will be reduced to 1 ( $\$40/5 = 8$  Hand Counts)
- If the Cash-out increment is set to \$1:
  - They will actually cash out \$42 (a multiple of \$1)
  - \$0.50 will remain on the Cabinet
  - The Hand Count will be reduced to 0 ( $\$42/5 = 8.4$  Hand Counts)

- If the Credits on the Cabinet drop below the minimum Bet, a Hand Count Reset timer will begin (the length of the countdown can be changed in settings; a good default is 30 seconds)
- When the countdown reaches 0, the Hand Count resets to 0
- If more Credits are added to the Cabinet before the countdown ends, the countdown stops, and the Hand Count is retained

### Example

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 Cabinet remain

## 01.04 Cash-Out Requirements and Limitations

Ref: GA Code § 16-12-35 (2021) • O.C.G.A § 50-27-71.1 (2025) • RU 13.3 (2019)

Cash-out in Georgia COAM has several specific limitations:

- A COAM Cabinet **cannot** dispense cash

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### Note

Prior to July 1, 2026:

- A COAM game can award vouchers, gift cards, or lottery products
  - 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 can be used for any legal purchase at any location that accepts them

- The player can cash out no more than \$5 per Hand Count
- Each Hand Count is treated as an individual game with a \$5 maximum award
  - Put another way, a \$1500 cash-out isn't a \$1500 win; it is  $300 \times \$5$  wins
  - Because of this, there are no taxable wins in Georgia COAM
  - Cheating and money laundering are also much more difficult. Cashing Out \$20,000, for example, would require the player to play 4,000 times

## 01.05 Location Requirements

*Ref: O.C.G.A. § 50-27-84 (2025) • RU 13.1 (2019)*

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
- COAM revenue, specifically net receipts, cannot exceed 50% of the total revenue for the location
- There is a maximum of 9 COAM machines per site

## 01.06 Other Regulations

### SAS Support

*Ref: RU 13.1 (2019) • COAM SAS Requirements v1.8*

- 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

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- The Site Controller will confirm the identity of the Game Pack by running an 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

## No Shared Progressives

Ref: O.C.G.A § 50-27-70 (2025)

- Because the legal definition of “Class B” COAM only permits carry-over of credits within a single player session on a single Cabinet, progressives cannot legally be shared between cabinets
  - Games that are a part of the same Game Pack may share Progressives within that single Cabinet, as the game session includes all of the games in a Game Pack

## 01.07 Other Considerations

These are not explicitly stated regulatory requirements; rather, they are guidance we have received from our interactions with regulators. Proceed with caution.

### Table Game Imagery Disallowed

- Gambling imagery—craps tables, roulette wheels, playing cards, casino backgrounds, and so on—is consistently rejected by regulators
- Card suits and face cards are similarly called out and are better avoided
  - Traditional royal symbols (A, K, Q, J, and 10) have been allowed so long as they did not look like cards and were not paired with a suit
- Dice have been allowed so long as they are not being used in a gambling scenario

### Cash Labels and Imagery Disallowed

- There can be no messaging, explicit or implied, that the game will dispense actual cash; any such messaging will be rejected. This has been communicated to us unequivocally
  - 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 reel Symbols and the like are OK

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- Bank and cash themes are OK

## Summary

- **Skill Tests**

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

- **Hand Count**

- Hand Count starts at 0; add 1 Hand Count per play
- The player can cash out only \$5 per Hand Count
  - For every \$5 cashed-out, subtract 1 Hand Count
- Credits falling below the minimum Bet triggers the Hand Count Reset countdown
  - If no credits are added before the countdown ends, Hand Count resets to 0

- **Cash Out**

- No cash, award vouchers, gift cards, or lottery products
- After July 1, 2026, only prepaid gift cards and lottery products

- **Locations**

- No more than 50% revenue from COAM
- Limit of 9 COAM cabinets per location

- **Restrictions**

- No external control aside from Intralot's Site Controller
- No shared Progressives between Cabinets
- Secondary SAS can not enable/disable games
- No casino imagery
- No "Cash"

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## 02 Skill Test Considerations

### 02.01 Features Common to Skill Test Presentations

The following patterns are standard ways to implement the legally required Skill Tests in-game.

- 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

### 02.02 Common Skill Test Types

These are quick sketches of the most common, compliant 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 appear at the top and bottom of every reel allow the Player to nudge a reel up or down by one reel stop

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- 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 (this is the only exception to the rule that the *Play* button is disabled during a Skill Test)
    - 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

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## 03 Market Considerations

Designing COAM games requires a different mindset and considerations than traditional Class 2 and Class 3 slot games.

### 03.01 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—inasmuch 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
  - Anecdotally, they tend to be younger, are largely working class, and are more likely to be male than casino players. As such, the themes that work in casinos do not always work in COAM
  - Many speak English as a second language; some do not speak English at all. Aim for designs that are understandable without needing to read anything
- 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. Design games and features so that they are still playable and enjoyable without sound
  - Make sure you can mute the sound in your game. If you cannot, 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 COAM games and cabinets
  - Screens can be difficult to see through the glare from overhead lights, and may be washed out by outside light, depending on how the location is set up. Large, bold, contrasty designs and clear guiding animations help alleviate these problems
  - Maintenance of the machines is the responsibility of the MLH, who may not be immediately available if a problem arises. It is important to design with robustness and recovery in mind, both in hardware and software. Any repair more involved than power cycling the Cabinet is likely to leave it out of order for a time
  - These locations are unlikely to have any on-premises security to prevent damage or attempts to break into the Cabinet. Once again, building robust hardware is important
  - The space is often limited, with low ceilings and cramped seating. There is not much to be done about this except to make games that players will keep playing regardless of any discomfort



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

### 03.02 What Attracts and Sustains COAM Players

In our experience and observation, these factors can make the difference between success and failure. Note that these are generalities and prone to change over time and even from location to location.

- **Progressive Jackpots:** COAM players chase Progressives just like casino players. Games that prominently display Progressives tend to outperform those that do not
  - Game packs with shared Progressives should feature them prominently on the game select screen
  - Games with individual Progressives should show them on the game select screen as well so players will know which games have Progressives
  - Persistent and Metamorphic features can create a similar anticipatory feeling as well
- **"Fair" math:** Since they tend to play more often and for shorter periods of time compared

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to casino players, finding the right math for COAM players can be a challenge.

- Avoid wins that pay back less than your bet; players report they can be frustrating, feeling like a waste of time and effort
- Too many *small* wins can become grating—recall that the Skill Test isn't a feature, it's a chore. Players can become bored or annoyed with a Skill Test that comes up too often for little gain
- Too *few* wins can be a problem, even if the eventual wins are big. Not all players are patient; many will walk away from a game that feels as though it is only taking from them
- **Simplicity:** COAM games, especially their Skill Tests, need to be quick and easy to grasp. For example, most COAM games also 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 without resorting to the Help pages
- **Familiarity & Innovation:** Many COAM players can be reluctant to try games with unfamiliar Skill Tests. At the same time, some players do seek out the new and different. The safest approach to attracting the most players is to mix the innovative and the tried-and-true in each Game Pack

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## GA Regulation Documents

### Georgia Criminal Code

#### Relevant Provisions of Georgia Criminal Code

- GA Code § 16-12-20 Definitions
- GA Code § 16-12-35 Applicability of part; penalty for violation

### Official Code of Georgia Annotated

#### COAM Law May 9, 2025

- O.C.G.A § 50-27-70 Legislative findings; definitions
- O.C.G.A § 50-27-71.1 Gift cards; redemption
- O.C.G.A § 50-27-84 Limitation on percent of monthly gross retail receipts derived from machines; verified reports; consequence for violations; submission of electronic reports
- O.C.G.A § 50-27-87 Master licenses; requirements and restrictions for licensees
- O.C.G.A § 50-27-101 Class B accounting terminal; communication networks; other procedures and policies
- O.C.G.A § 50-27-102 Role of corporation; implementation and certification; separation of funds and accounting; disputes

### GLC Rules – COAM

- RU 13.1 COAM Administration
  - RU 13.1.2 DEFINITIONS
  - RU 13.1.3 LICENSEE QUALIFICATIONS
  - RU 13.1.4 APPLICATION REQUIREMENTS
  - RU 13.1.5 MASTER LICENSE
  - RU 13.1.13 PROHIBITED ACTIVITIES
  - RU 13.1.14 REQUIRED ACTIVITIES
- RU 13.3 Lottery Tickets as COAM Prizes
  - RU 13.3.1 PURPOSE
  - RU 13.3.2 DEFINITIONS
  - RU 13.3.3 GENERAL RULES

### Misc Documents

- SAS Protocol 6.02

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- [GA COAM SAS Requirements v1.8 \(2023\)](#)
  - [Standards for the Secured Compartment](#)