



Cory Fox
Cory.Fox@fanduel.com

July 14, 2026

Via Email to Karen.parkman@orc.oregon.gov
Karen Parkman, Director of Administration
Oregon Racing Commission
PO Box 366
Gresham, OR 97030

Re: FanDuel comments on Oregon Licensing Amendments

Dear Director Parkman:

I write to provide comments on behalf of FanDuel Group, Inc. ("FanDuel") regarding the Oregon Racing Commission's (the "Commission") proposed amendments to OAR 462-120-0010 (the "Proposed Amendment"). Based on our extensive experience as an operator in the sports betting and horse racing industries, and as a collaborator with regulators of sports wagering and horse racing in many states in the development of their regulations, we offer constructive feedback on the Proposed Amendment for the Commission's consideration. FanDuel thanks the Commission for affording stakeholders the opportunity to provide comments on the Proposed Amendment.

The proposed amendments to OAR 462-120-0010(6) clarify that any reciprocity license used by an operator must be issued by a regulator that regulates horse racing. FanDuel appreciates the clarifying statements regarding the Proposed Amendment at the Commission's June 23, 2026, public hearing that this change intends to correct a previous interpretation that operators could also utilize licenses from regulators that regulate gaming. We understand the Commission's desire to reduce the administrative burden during the reciprocity licensing process by only utilizing licenses from regulators that regulate horse racing. While we agree that the Commission should not be burdened with reciprocity licenses from all non-racing regulators across the country, there are non-racing regulators with the capacity, resources, and licensing standards that align with the Commission's licensing expectations. Several operators utilize such regulators, and a removal of this option would present significant administrative and financial burdens for operators to obtain the appropriate licenses.

FanDuel respectfully recommends the Commission consider language that would permit reciprocal licenses from non-racing regulators at the discretion of the Commission. This provides the relief the Commission is seeking in the administrative process for licensing while providing options for reciprocal licensing for operators from regulators the Commission has thoroughly considered and approved. We have provided the following edits below to OAR 462-120-0010(6) to this effect. For the sake of clarity, proposed additions will be shown in **bold and underlined red** text.

OAR 462-120-0010 Who Must Be Licensed

(6) Notwithstanding OAR 462-120-0010(4) and ORS 462.725 subsection 3, the hub's out-of-state employees who have access to personal identifiable information (PII) or interact with the



account holders shall have an Oregon license unless the out-of-state employee holds a current racing and/or gaming license that regulates horse racing, or that regulates gaming as approved by the commission, and is issued by a regulator in a state or jurisdiction within the United States that has completed a full background check (including fingerprints). The jurisdiction must be verified and approved by the Oregon Racing Commission.

We appreciate your time and consideration of our comments and would be happy to discuss them at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cory Fox'.

Cory Fox
Senior Vice President, Public Policy and Sustainability