



# RNG Labs International Ltd.

46, Triq il-Parrocca  
St. Venera  
Malta

Tel + 356 79254072  
[www.rnglabs.net](http://www.rnglabs.net)

## Random Number Generator (RNG) Certification

<b>Product name</b>	Random Number Generator (RNG)
<b>Jurisdiction</b>	United Kingdom Gambling Commission (UKGC)
<b>Applicant</b>	MervCF Limited
<b>Test institute</b>	RNG Labs International Ltd.
<b>Type of product</b>	Random Number Generator (RNG)

**Authorised by:**

**John Micallef**  
**Head of Lab**  
23<sup>rd</sup> December 2024

## Table of contents

General data.....	2
Applicant data.....	2
Platform information .....	2
1. Introduction.....	3
2. Scope of testing.....	3
3. Source code review.....	3
4. Test results overview.....	3
4.1 RNG details.....	3
4.2 Scope and approach to testing and a description of all tests applied.....	4
4.2.1 Documentation and code review.....	4
4.2.2 Testing RNG output:.....	4
Appendix A: Documentations & Code Review .....	6
RNG implementation .....	6
Statistical analysis.....	6
Source code inspection.....	7
The RNG is unpredictable .....	7
The seeding is unpredictable.....	7
The RNG does not cycle or synchronise.....	7
Shuffling.....	8
Scaling is applied properly .....	8
Limitations.....	8
Appendix B: Empirical Testing.....	9
NIST Test suite.....	9
DIEHARD Battery of Tests.....	10

## General data

<b>Report number</b>	ME-UK-002-2024
<b>Jurisdiction</b>	UK Gambling Commission
<b>Regulations</b>	UKGC remote gambling and software technical standards, published February 2021, updated May 2024.
<b>Test date</b>	14 <sup>th</sup> October 2024
<b>Project engineer</b>	Mr. Loc Phan Van

## Applicant data

<b>Company name</b>	MervCF Limited
<b>Address</b>	Av. Pastor Diaz, Provincia de Puntarenas, Jaco, 61101, Costa Rica
<b>Contact</b>	Dominika Pistorova

## Platform information

<b>Supplier</b>	Value coders
<b>Version</b>	1.24.12.001

## 1. Introduction

The intent of this report is to indicate that RNG Labs International Ltd. has completed its evaluation of the Random Number Generator (RNG), version 1.24.12.001, provided by MervCF Limited.

## 2. Scope of testing

MervCF Limited submitted the required materials to RNG Labs in order to conduct a random number generator analysis on the RNG. The scope of this analysis was limited to software verification, source code review, and data analysis.

The RNG was evaluated against the RNG-specific requirements of the following technical standard:

- Testing strategy for compliance with remote gambling and software technical standards, April 2022.

## 3. Source code review

MervCF Limited submitted appropriate documentation and FULL source code which pertains to the generation of random numbers on 14<sup>th</sup> October 2024. RNG Labs reviewed the source code provided by tracing the path of the RNG application from the initiation of the draw to the selected output of random numbers.

RNG Labs inspected the source code, where practicable, in an attempt to find any undisclosed switches or parameters having a possible influence on randomness and fair play. RNG Labs assessed the ability of the RNG to produce all numbers within the desired range.

## 4. Test results overview

Requirements within this scope are included in this test results overview.

### 4.1 RNG details

<b>RNG Description</b>	The RNG implementation uses Math.random() to uniformly select and remove random elements from a predefined set, ensuring non-repeating values for each lottery instance.
<b>RNG Version No.</b>	1.24.12.001
<b>Hardware/Software Base</b>	Software

Reference	Functionality	SHA-Checksum
new_randomBall.js	RNG	565a18068555dfc9cc88fc3b395bc5aad9ec917

## 4.2 Scope and approach to testing and a description of all tests applied

The scope of the RNG test is narrowly focused on a rigorous evaluation of the documentation, source code, and output of the RNG specifically against RTS Implementation Guidance 7A.a, ensuring compliance with recognised international standards. This testing aims to verify that:

1. The output of the RNG is uniformly distributed across the entire output range.
2. The outcomes of games using the RNG align with expected or theoretical probabilities.

This targeted approach emphasizes security, unpredictability, and non-repeatability in number generation while ensuring the RNG meets the criteria for acceptable randomness as defined by the applicable technical standards. Here's a comprehensive detail of the scope and the approach to testing:

### 4.2.1 Documentation and code review

The license holder is required to submit documented references to the RNG's algorithm, which should be well-established and published in a recognised international publication. We also require access to the source code and any related recalculative procedures linked to the RNG for an in-depth review. Our approach for this part of the scope will be as follows:

- Identifying RNG Algorithm: We will thoroughly identify the RNG algorithm and research any known weaknesses associated with it to assure its integrity and security.
- Verification of RNG Internal State: The internal state of the RNG will be scrutinised to confirm its adherence to unpredictability and non-repeatability requirements.
- Verification of RNG Implementation: We will verify seeding, background cycling, minimal reseeding to ensure that the RNG implementation caters to unpredictability and non-repeatability requirements efficiently.
- Verification of RNG Output Usage: The use of the random numbers, including scaling and shuffling, will be reviewed to ensure it aligns with industry standards.
- Compilation of RNG Code: After resolving any identified issues within the code, we will compile the RNG code to ensure its operability.

### 4.2.2 Testing RNG output:

- Diehard Test Suite: The RNG output will undergo the stringent Diehard test suite, which applies a series of statistical tests to determine the randomness of the output. These are a battery of statistical tests for measuring the quality of a RNG's sequence of numbers and determining whether they are truly random.
- NIST Tests: The National Institute of Standards and Technology (NIST) tests will be applied to ensure the RNG output meets the national standard for randomness. These

are designed to test the randomness of binary sequences produced by either hardware or software-based RNGs and consist of 15 different tests focused on various aspects of randomness.

## Appendix A: Documentations & Code Review

### RNG implementation

The RNG implementation in this code generates random numbers by selecting elements from a predefined array (`availableBalls`) using a uniformly distributed random index calculated with `Math.random()`. Once an element is selected, it is removed from the array to ensure non-repetition within the same lottery instance. This approach ensures that the random generation process operates without replacement, creating a unique subset of numbers from the pool.

Each iteration begins with a fresh copy of the `availableBalls` array, making the process independent for every lottery instance. The results are stored in a buffer as 32-bit integers (4 bytes each) and written to a binary file for efficient storage and analysis.

### Statistical analysis

In order to verify that the pseudo random numbers generated by the algorithm satisfy the 'acceptably random' requirement, the output of the RNG is subjected to a statistical analysis. This analysis consists of a series of tests that determine the chance that these numbers have not been generated by a random-like process. Each of these tests observes the behaviour of a specific aspect of the series of random numbers, and will fail if the chance that a random process has not generated these series is above a certain threshold.

These tests will verify whether the output from the RNG is uniformly distributed among the entire output range as stipulated by guidance rule 7A a. i), but is not limited to just this verification.

The software used for statistical analysis of raw output is the Dieharder RNG test suite (Brown, 2015). This is a test suite maintained by Robert G. Brown from Duke University Physics Department. It builds upon the Diehard battery of tests from George Marsaglia (Marsaglia, 1995), but also includes tests from the statistical test suite from NIST (Soto, 1999) and tests developed by Robert G. Brown himself.

The following "bitwise" tests from the NIST Test Suite were applied:

- Frequency (Monobits) Test
- Frequency Test within a Block
- Run Test
- Test for the Longest Run of Ones in a Block
- Binary Matrix Rank Test
- Discrete Fourier Transform (Spectral) Test
- Non-overlapping Template Matching Test
- Maurer's "Universal Statistical" Test
- Linear Complexity Test
- Serial Test
- Approximate Entropy Test
- Cumulative Sums (Cumsum) Test
- Random Excursions Test
- Random Excursions Variant Test

The following "bitwise" tests from the DIEHARD Battery of Tests of Randomness were applied:

- Birthday Spacing Test
- Overlapping 5-permutations Test
- Binary Rank 31×31 Test
- Binary Rank 32×32 Test
- Binary Rank 6×8 Test
- Bitstreams Test
- Overlapping Pairs Sparse Occupancy (OPSO) Test
- Overlapping Quadruples Sparse Occupancy (OOSO) Test
- DNA Test
- Count the 1's (Specific Bytes) Test
- Count the 1's (Stream of Bytes) Test
- Parking Lot Test
- Minimum Distance Test
- 3-D Spheres Test
- Squeeze Test
- Overlapping Sums Test
- Runs Test
- Craps Test

The results of all the tests are listed in appendix B.

### **Source code inspection**

The source code was inspected to verify that the remaining requirements 7A.a have been met. In this section for each of the requirements a brief outline is given how the source code ensures that the requirements are met.

### **The RNG is unpredictable**

The RNG uses JavaScript's `Math.random()` to generate random indices for selecting elements from the `availableBalls` array. While `Math.random()` provides a uniform distribution, it is a pseudorandom number generator (PRNG) that relies on deterministic algorithms, making its outputs predictable if the internal state or seed is known.

### **The seeding is unpredictable**

The RNG in this implementation relies on JavaScript's `Math.random()`, which does not allow direct control or specification of its seed in most JavaScript runtime environments. Instead, it is seeded automatically by the engine, typically using the system clock or other system-level entropy sources.

### **The RNG does not cycle or synchronise**

The RNG does not exhibit cycling or synchronization within the same lottery instance because each iteration begins with a new copy of the `availableBalls` array. Random indices are generated independently using `Math.random()`, which ensures that the output is not synchronized or repeated within a single instance



## Shuffling

The RNG implements a partial shuffling mechanism by selecting a random number from the availableBalls array and removing it after selection. This approach mimics a “shuffle without replacement” process, ensuring that no ball is selected twice within a single lottery instance.

## Scaling is applied properly

Scaling is applied correctly for the random index calculation, as the random index is computed using `Math.random() * availableBalls.length`, ensuring that the generated index falls within the valid range of the array.

## Limitations

- Acceptable DoF: RNG provides outputs with moderate degrees of freedom, suitable for non-critical applications like simulations, games, or simple lotteries.
- Usage: Suitable for scenarios requiring unique selections without replacement.
- Security: Not suitable for cryptographic purposes due to reliance on `Math.random()`, which lacks cryptographic strength and predictability.
- OS/System version and constraints: None.

This list was identified at the best of RNG Labs knowledge by analysing the test item(s) and collecting all possible reputable information sources at the time of the testing activity.

## Appendix B: Empirical Testing

Please refer to the Appendices for details of the tests applied. The test results are summarised as follows:

### NIST Test suite

The NIST Tests are based on the suite of tests released by the National Institute of Standards and Technology in Special Publication 800-22, Revision 1a (revised April 2010). They test sequences of raw binary output from the RNG. There were 03 sample size data file outputs tested, comprises of: 100.000.000, 2000.000.000 and 300.000.000 random numbers.

Test name	P-Value (100.000.000)	P-Value (200.000.000)	P-Value (300.000.000)	Assessment
Frequency (Monobits) Test	0.804337	0.282626	0.236810	Pass
Frequency Test within a Block	0.685579	0.494392	0.275709	Pass
Run Test	0.148094	0.282626	0.437274	Pass
Test for the Longest Run of Ones in a Block	0.481416	0.663130	0.202268	Pass
Binary Matrix Rank Test	0.685579	0.207730	0.437274	Pass
Discrete Fourier Transform (Spectral) Test	0.840081	0.117089	0.455937	Pass
Non-overlapping Template Matching Test	0.657933	0.842937	0.224821	Pass
Maurer's "Universal Statistical" Test	0.339799	0.863690	0.304126	Pass
Linear Complexity Test	0.407091	0.167184	0.834308	Pass
Serial Test	0.602458	0.863690	0.816537	Pass
Approximate Entropy Test	0.862344	0.419021	0.289667	Pass
Cumulative Sums (Cumsum) Test	0.383827	0.788728	0.419021	Pass
Random Excursions Test	0.706149	0.902994	0.759756	Pass

Random Excursions Variant Test	0.437274	0.938915	0.366918	Pass
--------------------------------	----------	----------	----------	------

Conclusion: The RNG is **ACCEPTED** as random at the 95% confidence interval.

### DIEHARD Battery of Tests

The Diehard Tests are based on the test suite published by George Marsaglia in 1995. They test sequences of raw binary output from the RNG. There were 03 sample size data file outputs tested, comprises of: 100.000.000, 2000.000.000 and 300.000.000 random numbers.

Test name	P-values (100.000.000)	P-values (200.000.000)	P-values (300.000.000)	Assessment
Birthday Spacing Test	0.64748512	0.47569999	0.59655103	Pass
Overlapping 5-permutations Test	0.71078739	0.96182339	0.84893112	Pass
Binary Rank 32x32 Test	0.46058649	0.44234393	0.83345381	Pass
Binary Rank 6x8 Test	0.63155249	0.38409047	0.96720085	Pass
Bitstreams Test	0.94453638	0.95664758	0.45667238	Pass
Overlapping Pairs Sparse Occupancy (OPSO) Test	0.31786996	0.20836155	0.25076263	Pass
Overlapping Quadruples Sparse Occupancy (OQSO) Test	0.65364145	0.43444901	0.09226282	Pass
DNA Test	0.21870576	0.55391739	0.41267325	Pass
Count the 1's (Specific Bytes) Test	0.76685211	0.76451019	0.78121131	Pass
Count the 1's (Stream of Bytes) Test	0.52861703	0.98397448	0.96313503	Pass
Parking Lot Test	0.08570837	0.65655550	0.75842967	Pass
Minimum Distance Test	0.34019681	0.75113996	0.98773321	Pass

3-D Spheres Test	0.20426358	0.17454247	0.67451277	Pass
Squeeze Test	0.41781700	0.77060965	0.89680843	Pass
Overlapping Sums Test	0.60295838	0.79372271	0.20138990	Pass
Runs Test	0.77914897	0.99986204	0.46183848	Pass
Craps Test	0.64516949	0.47636002	0.55649974	Pass

Conclusion: The RNG is **ACCEPTED** as random at the 95% confidence interval.