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DESIGN STUDY

Retiring a ballpark's payment estate between seasons: 1,160 assets for two merchants, one record each, no terminal left live

Complete design on current platforms

CAPABILITY	INDUSTRY	SETTING
IT Spend Optimization	Sports & Entertainment	Ballpark operator
DOCUMENT	**VERSION**	**DATE**
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Document control

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Sign-off	"An engagement under this design is signed by the practice lead before any build proceeds."		

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CONVENTIONS

Source tags. [S] figure or clause read from the standard owner's own current document on Oct 22, 2026, or carried from a Symbeeo document that read it, where the text names that document · [S*] figure from the owner's page summary or a faithful copy where the owner's own page could not be opened · [A] design assumption · [T] design target (the record's outcome figure and anything derived from it). Every figure carries at least one tag. No figure comes from any prior engagement, file or asset. A row with more than one tag is counted once: as a published figure if any tag is [S] or [S*], otherwise as an assumption if any tag is [A], otherwise as a design target.

Table 1. Revision history

Date	Version	Change
Oct 22, 2026	`1.0`	First issue.

1 · Scope

Who it is for. The IT director of a ballpark operator and the PCI compliance leads of the two merchants who take cards in the building, who have replaced every payment terminal, till and kiosk over the winter and now have to show the assessor, the acquirer and both finance teams that each old device left the estate unrecoverable, unable to transact, and off the right merchant's books — before the first pitch of the new season.

Typical buyer [A]. A ballpark operator with a 41,000-seat ballpark, home to one baseball club: 81 home games and about 12 concerts and events, 93 event days a year. Two merchants take cards: the club (team stores, premium clubs, ticket office) and a third-party concessionaire (food and drink) with its own merchant ID. Over the off-season both move to a new P2PE solution and new hardware. Retiring: 700 payment terminals (410 fixed, 290 handheld), 260 POS tills with solid-state drives, 96 self-order kiosks, 84 kitchen-display and menu-board players with flash storage, and 20 back-office servers with two drives each — 1,160 assets. The club owns 296 of them, the concessionaire 864.

What is in. The retirement list drawn from both merchants' registers and the outgoing P2PE solution provider's device inventory; three disposal paths by device type; deactivation of terminal IDs at the acquirer; custody; sanitization, verification and one record per device; closure on each merchant's asset and fixed-asset records; the off-season window. **What is out.** Commissioning the new estate (SEC-007 covers the segmentation it lands in); the disposal partner's commercial terms; receipt printers, cash drawers and other devices without storage; paper records.

Assumptions. The outgoing P2PE solution's instruction manual tells merchants how retired terminals are returned to the solution provider, and both merchants follow it [A]. The club runs the program for both merchants; each merchant signs its own records [A]. The disposal partner holds a current R2v3 or e-Stewards certification, as in SPD-005 [A]. Records are kept 7 years [A].

Related documents, read Oct 22, 2026. SRA-SPD-001 v1.0 (R10, R11, R17) and SDD-SPD-001 v1.0 · SPD-005, store-estate disposal (certificate fields and sanitization methods) · PCI DSS v4.0.1, Requirements and Testing Procedures (June 2024), PCI SSC's text; the Council's document library sits behind a license click-through and the text was read from a faithful copy (`https://www.middlebury.edu/sites/default/files/2025-01/PCI-DSS-v4_0_1.pdf`) · PCI SSC, Point-to-Point Encryption (`https://www.pcisecuritystandards.org/standards/point-to-point-encryption-p2pe/`) · NIST SP 800-88 Rev. 2, Guidelines for Media Sanitization, September 2025 (`https://csrc.nist.gov/pubs/sp/800/88/r2/final`) · IEEE 2883-2022 (`https://standards.ieee.org/ieee/2883/10277/`).

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1c · Public implementations this design follows

Table 2. Public implementations this design follows

Implementation	Who published it · date	What it settles for this design	URL
PCI DSS v4.0.1, Requirements 9.4.7 and 9.5.1.1	PCI SSC · June 2024; text read from a faithful copy on Oct 22, 2026 [S*] · published standard, used to build our own design	R3 and R4 as published: electronic media with cardholder data destroyed, or the data rendered unrecoverable, when no longer needed; an up-to-date list of POI devices with make and model, location and serial. A terminal leaving the building is a change to that list, not only a disposal	https://www.middlebury.edu/sites/default/files/2025-01/PCI-DSS-v4_0_1.pdf
NIST SP 800-88 Rev. 2	NIST · September 2025 · published standard, used to build our own design	R5 and R6: methods Clear, Purge and Destroy; cryptographic erase counted only where the drive's conditions are verified; a certificate per sanitized device with the Appendix C fields	https://csrc.nist.gov/pubs/sp/800/88/r2/final
PCI SSC, Point-to-Point Encryption standard page	PCI SSC · May 3, 2024, updated Jul 23, 2025 · published standard, used to build our own design	R7 and §4.2: merchants on a PCI-listed P2PE solution "have fewer applicable PCI Data Security Standard (PCI DSS) requirements"; the terminals and their keys are managed under the solution, so the merchant follows its instructions rather than wiping a terminal itself [A]	https://www.pcisecuritystandards.org/standards/point-to-point-encryption-p2pe/

All three rows are standards. No public, dated account of a sports venue retiring its payment estate was found on Oct 22, 2026, so no venue's deployment is shown.

2 · Requirements register

Table 3. Requirements register

#	Requirement	Value	Source
R1	Estate retiring	1,160 assets: 700 terminals, 260 tills, 96 kiosks, 84 display players, 20 servers; 480 merchant-held storage media	[A]
R2	Two merchants	club 296 assets; concessionaire 864	[A]
R3	Cardholder-data media	destroyed, or the data rendered unrecoverable, when no longer needed	[S*] PCI DSS v4.0.1 9.4.7
R4	POI device list	make and model, location, serial, kept up to date [S*] PCI DSS 9.5.1.1; each retired terminal leaves both merchants' lists with its disposition recorded	[T]
R5	Retired storage-bearing assets with a sanitization record	100 %	[S] SRA-SPD-001 R17
R6	Certificate fields, per device	NIST SP 800-88 Rev. 2 Appendix C fields	[S] via SPD-005 R2

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#	Requirement	Value	Source
R7	Terminals	returned to the outgoing P2PE solution provider under its instructions; provider's receipt and decommission confirmation per serial	[A]
R8	Terminal IDs	deactivated at the acquirer before the terminal leaves the building: 100 %	[T]
R9	Reconciliation	every retired asset matched across its merchant's fixed-asset register, the provider's device inventory (terminals) and the custody log: 100 %	[T]
R10	Window	all 1,160 records closed ≥ 30 days before the first home game	[T]
R11	Custody count difference before sanitization or return	0	[T]
R12	Record on the merchant's asset register	≤ 10 working days after sanitization or the provider's confirmation	[T]
R13	Record retention	7 years	[A]
R14	Who signs	each merchant's PCI lead signs that merchant's records; the club signs the program record	[A]

Fourteen rows; four carry a standard's figure (two of them [S*] only), five are design assumptions, five are design targets.

3 · Architecture overview

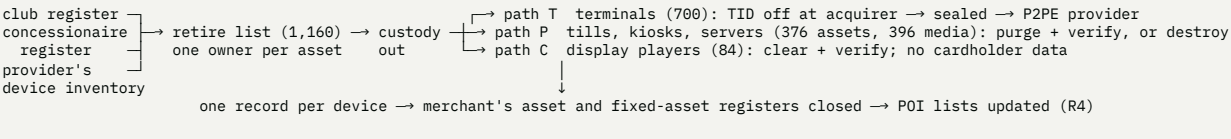


Figure 1. Three disposal paths, two merchants, one record each

A terminal is not wiped by the merchant; it is switched off at the acquirer and goes back to the P2PE provider. A till or kiosk that could have held account data is purged and verified, or destroyed. A menu-board player held no account data but still leaves with a record. Every path ends on the right merchant's books.

Table 4. Architecture overview

Path	Devices	Check performed	Record produced
T · terminals	700: club 220, concessionaire 480	terminal ID deactivated at the acquirer (R8); serial on the POI list and the provider's inventory; sealed, counted, shipped to the provider	provider's receipt and decommission confirmation per serial (R7)
P · payment-zone storage	376 assets, 396 media: 260 tills, 96 kiosks, 20 servers × 2 drives	purge by the drive's sanitize command, verified; destroyed on site where purge cannot be verified (R3)	certificate per device, Appendix C fields (R6)

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Path	Devices	Check performed	Record produced
C · other storage	84 display players	clear, verified by read-back sample	certificate per device (R5)
Close	all 1,160	owner, register line and disposition matched (R9)	closed asset record; fixed-asset write-off; POI list entry removed (R4)

4 · Design by subsystem

4.1 One list, one owner per asset.

The retire list is built from three sources, not from the stands: the club's fixed-asset register, the concessionaire's, and the outgoing P2PE provider's device inventory for both merchant IDs [A]. Every asset carries one owning merchant, its storage media count, and whether it sat in the payment zone. An asset found in the building but on no register is a finding, raised before the retirement starts [A]. Rejected: one combined list owned by the club — the concessionaire's assessor reads the concessionaire's records, and a shared list blurs who signed what.

4.2 Terminals: off at the acquirer, back to the provider.

In a P2PE solution the merchant does not wipe the terminal; the solution's instructions say how it goes back (R7) [A]. Before any terminal is unplugged, its terminal ID is deactivated at the acquirer, so a terminal that goes missing in transit cannot take a payment (R8) [T]. Each terminal is then sealed in a numbered container, counted, and shipped to the provider; the provider's receipt and decommission confirmation close it. Its entry on the merchant's POI list (R4) [S*] is updated with the date and disposition, not deleted silently.

4.3 Payment-zone storage: purge or destroy.

Tills and kiosks never received clear account data under the old solution [A]; the design does not rely on that and treats their drives as cardholder- data media under 9.4.7 (R3) [S*]. Purge by the drive's standardized sanitize command, as IEEE 2883 specifies for the interface; cryptographic erase accepted only where the drive is verified as self-encrypting under NIST's conditions [S] via SPD-005 R4; otherwise destroyed on site by the certified partner's shredder before collection [A]. The 40 server drives are purged on site; any that fails verification is destroyed there [A].

4.4 Display players.

Kitchen displays and menu boards ran outside the payment zone and held menus, not account data [A]. They are cleared and verified by read-back sample, and still leave with a certificate (R5) [S], because the asset record cannot close without one.

4.5 The window.

The retirement starts the day after the old estate's last event and the new estate's acceptance, and every record closes at least 30 days before the first home game (R10) [T]. Thirty days is the margin for a certificate that comes back incomplete, or a terminal the provider has not confirmed, to be chased without a deadline.

4.6 Records and closure.

Each asset closes only when its record — provider confirmation for path T, certificate for paths P and C — is attached on its merchant's asset register, within 10 working days (R12) [T], and the fixed-asset line is written off on the same event. Each merchant's PCI lead signs its own records; the club signs the program record (R14) [A]. Records are kept 7 years (R13) [A].

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5 · Failure behavior

Table 5. Failure behavior

Failure	Behavior	Source
A terminal ID cannot be deactivated (acquirer has no record of it)	terminal held in the building; acquirer and provider reconcile the ID before it moves	[T] R8
Custody count differs at the provider's receipt	batch held; both custody logs compared; missing serial reported to the owning merchant's security the same day	[T] R11
Provider does not confirm decommission within 15 working days	escalated to the provider under the solution's agreement; record stays open	[A]
Sanitize command fails on a till drive	drive destroyed on site; certificate records destroy, not purge	[A]
Asset found in the stands on no register	logged as a finding; owner established before it enters any path	[A]
Record not closed by the 30-day margin	named to both merchants' PCI leads; the first home game proceeds on the new estate, the open record remains a finding	[A]

6 · Limits

- The PCI DSS text is from a faithful copy, not the Council's own library, which sits behind a click-through; it is read again at design freeze.
- How the outgoing P2PE provider takes terminals back is set by that solution's instructions, which were not read; R7 is an assumption until they are.
- That tills and kiosks never held clear account data is assumed and not relied on; they are purged or destroyed either way.
- The design proves disposal and record closure; it does not value resale or claim any saving.
- No figure here has been measured.

7 · Lessons learned

None yet — this is a design study; populated after the first build against it.

8 · The author

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Signed off by Edwin Ozer, Founder.

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SYMBEEO

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Compared. Then Delivered.

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Figures are as published by their sources on the dates given in this document; figures marked [A] are assumptions.

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