AUSTRALIAN INTERNET BOOKMAKERS ASSOCIATION

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Dear Commissioners

Draft Gambling Report

The Australian Internet Bookmakers Association commends the Commission for its work and supports the recommendations contained in the draft report.

These comments are directed to developments that have occurred since the publication of the draft report, and consider some of the objections that have been made by others to the draft report.

This submission addresses five specific areas. These are:

(1) responsible gambling, in particular the areas of pre-commitment facilities by Australian online providers, and the question of credit betting;
(2) the Interactive Gambling Act;
(3) issues around sports betting and the integrity of sports;
(4) the question of race funding and product fees; and
(5) the scope for national regulation.

1. Responsible Gambling

pre-commitment facilities for online gambling

In our earlier submission, we proposed that pre-commitment facilities become a mandatory feature for all Australian online gambling sites. The Northern Territory and recently South Australia, have been examining ways of implementing pre-commitment facilities for online gambling sites. The Association acknowledges the consultation afforded by these jurisdictions around how this will work in practice.

A key feature both jurisdictions have agreed to in principle, is that the pre-commitment facility should be structured so that the player can set a "net loss" limit. Operators may additionally allow for deposit limits.

The "net loss" concept means that a player would be able to set whatever amount he or she thinks is appropriate as the maximum amount they wish to lose over any given period - say $100 a week $500 a month, or whatever the desired combination may be.

At this stage – and I note, contrary to the Commissions recommendation in relation to online gaming - it's intended there would be no set default pre-commitment amount. However, a gambling account cannot become active until the player has made a conscious choice whether or not to set a loss limit. This will be a mandatory field that must be completed as part of the player registration process.

(This facility will always be available to the player as part of the website, should they wish to set a limit at a later time.)

It is also agreed that a decision to revoke or decrease increase a limit should be subject to a delay of seven days.

The process going forward is that the Northern Territory proposes to await receipt of your final Report before settling the details, and exploring the appetite of the other States and Territories for national standards in this area. At this stage, the proposed implementation date is mid- to later- next year.

As operators, we would welcome national standards. It is simply too complex and expensive to architect computer systems according to each State's particular requirements.

We would urge the Commission to consider recommending not only the adoption of mandatory pre-commitment facilities for all Australian licensed online providers, but that the basic operational parameters of these facilities be nationally agreed and defined.

credit betting

The draft report noted concerns about credit betting and possible links to problem gambling. It recommended the maintenance of credit betting for bookmakers, but sought feedback on such questions as the proposals put forward in the Cameron Review that there be a minimum period before which a client could be allowed credit, or whether credit betting should only be available for higher denominated bets or larger punters.

In considering this area, it is helpful to recall that in the event of a default of a credit arrangement, it is the bookmaker who usually bears the financial cost. Accordingly, bookmakers take a number of steps to assess the creditworthiness of any applicant for credit. This can entail the need for an established business relationship before credit would be given.

However, the two proposals – that there be a minimum time period for credit betting or that it only be available for higher bets - just cause problems and don't really assist address problem gambling.

It could be argued that the proposed bet limit is exactly contrary to good responsible gambling practices because it leads to the peculiar situation where a betting provider must advise a client that he cannot offer credit for a $50 bet but is able to give credit for a $500 bet.

Likewise the mandatory time periods don't really do much other than formalise current due diligence practices. But again it leads to a strange outcome where a bookmaker must refuse credit to a client who on every measure is a good credit risk until the passage of three months. Why?

Accordingly we would support the Commission's proposal that this area be the subject of further research, but we would recommend the research occur before any changes are made to current practice.

Research is also helpful in relation to the question whether credit betting with on-course bookmakers and Internet bookmakers should be treated differently. There are acknowledged reasons why credit betting should be permissible for on-course bookmakers, but why, as a matter of principle, should credit betting be allowed for Internet or account wagering? This argument has some force but it is change for change's sake. At this stage, we see insufficient evidence to support a change to current practice. This should be a matter for further research.

Finally I note that the online bookmakers have no objection to the TABs being able to offer credit betting to selected clients.

Bookmakers have consistently said in relation to all queries regarding market access and market behaviour that we are not looking for a special deal. All that has been sought is a fair outcome. We also support competition as we believe this helps grow the market.

Accordingly, we agree that the restriction on the Tabs offering credit betting to selected clients is not justifiable.

2 The Interactive Gambling Act

The major online bookmakers support the recommendations of the draft report.

While this will be unsurprising to most observers given our commercial interest, we would urge all sides in the gambling debate to support the recommendations because of the consumer protection and responsible gambling reasons given by the Commission.

Prohibition doesn't work and the draft report identified over $700 million in player funds being spent offshore on online gaming products. By comparison the lawful sports betting market in Australia is only $300 million – less than half.

Any reasonable observer must agree that the Interactive Gambling Act – whatever its past merits - is now totally ineffective. We cannot keep the status quo.

The first response is to try for more effective ways of enforcing the prohibition - in other words building higher walls. The usual steps that are put forward are either filtering or ISP blocking, or payment blocking.

It appears it is not feasible to block access to these sites. Though technically possible, it comes with enormous cost and degradation of general Internet performance. Likewise those countries that have looked at blocking payments related to Internet gambling have found it to be too difficult to implement- in particular the ability to distinguish between legal and illegal gambling. Indeed, the United States authorities have put back implementation of its 2006 law for another six months until 1 June 2010.

It is also ineffective. There are now too many alternative payment mechanisms for restrictions on bank transfers or credit card usage to work.

The sensible response is to regulate online gaming. Australians would then at least have the option of playing with Australian sites under Australian responsible gambling controls.

The question is the terms and conditions under which this should occur.

Australian online gambling companies are largely supportive of the consumer protection measures outlined in the draft report. This obviously needs discussion, for example, operators would like to understand the practical aspects of the intervention strategies – but the members of this Association are supportive of the general approach set out by the Commission.

Since the publication of the draft report, there have been various objections raised to any changes to the IGA.

Opponents of Internet gambling have objected both to allowing access in the home and about the risk of normalising online gambling in the community.

The objection to "access" ignores the fact that online gaming is already here - all forms of online gambling are available to all Australians. The objection that any change to the IGA will see a "casino in every lounge room" or the sub-editors favourite "you can lose your house without leaving it", skip over the fact that this is precisely what can and does occur now. Australians play effectively unhindered on overseas sites.

The objection to any change to the IGA that has the most substance is the risk of normalising online gambling in the community.

One of the claimed merits of the IGA was that it dampened or slowed consumers take up of these higher-risk products. What happens if it is repealed?

We suggest there is scope for moderating adverse social impacts. The concern that often arises with allowing licensing is that every billboard, every television show, will be peppered with advertisements for internet casinos.

What the draft report has shown is the enormous appetite for online gaming products *without* lawful advertising. We suggest this could well be an area where appropriate advertising controls could help moderate any excessive stimulation of the online gaming market. This is not a call for an advertising ban – that would defeat the objective of letting players know there is an Australian alternative. Instead, advertising should be allowed on the Internet and, for example, in gambling specific magazines, but it may well be desirable that restrictions for on-the-ground or broadcast advertising are developed.

A corollary of this is that we better enforce advertising restrictions on offshore gaming companies, especially the Trojan horse method that is used now, whereby supposedly lawful advertising of a free play site invariably leads to connection with the "play for real money" sites. In this regard we again recommend that Australia follow a similar practice to that adopted by the advertising standards authorities in the United Kingdom, as described in our earlier submission.

This is another area where the merits of a truly national scheme of regulation are self-evident. This is not an area that can be addressed with a state-by-state response. It will be appreciated it would be counter-productive if, for example, one State decided it wanted to ban Australian providers from offering gaming machines or particular bet types when those products are readily available offshore.

The aim is to provide a locally competitive alternative to what Australians currently have available to them. Any attempt by any a particular State to carve out particular exemptions or set particular requirements, fails to appreciate the driver for the change.

A licensing scheme should be implemented as quickly as possible. It is noted that the independent senators have introduced private member's bills on aspects of the draft Report, to encourage the Federal Government to address particular aspects with urgency. We suggest that this area of online gaming is one where delay would be inexcusable.

The illegal online gaming market for Australia is more than twice the size of the lawful sports betting market. This is an enormous hole in our harm minimisation fence. This is not a case of discussing the refinement of any particular strategy – this is a situation where there is effectively no or limited player protection measures in place.

It is suggested that any reasonable assessment of the draft report would identify this as one of the priority areas for legislative reform. This needs a speedy response.

3. Sports betting and the integrity of sports

The topic of sports betting and the integrity of sports was not canvassed in the draft report but has been the subject of some publicity since its publication.

In recent months concern has been expressed about the potential for the corruption of sports.

Allegations of "tanking" in the AFL, concerns around the outcome of particular NRL games, and that announcement that prosecutors in Germany are leading an

investigation into alleged cases of match-fixing in some 200 European soccer games has drawn attention to the levels of protection for Australian sport.

Indeed, Sen Xenophon has called for sports betting to be suspended until such time as the issues are addressed, and he has foreshadowed a Senate enquiry to look at the impact of sports betting on sport. As well, the Premier of Victoria has called for national regulation of sports betting.

It is important to acknowledge the risks and the severe damage that could be done to the confidence in sport should match fixing be found to have occurred in Australia. It is helpful to look at the potential areas of risk, understand what we do now, but also to ask: what could we do better?

Bookmakers are usually the victims in any instance of match fixing. A sport, regulator or government may suffer 2 to 3 days of bad press but at the end of the day it's the betting operator that is liable to pay out the thousands if not millions of dollars. Accordingly bookmakers have perhaps an even greater interest in ensuring that all sporting events are decided on their merits.

Given the extent of our regulation, it is suggested we can put to one side any excessive concern that an Australian licensed betting provider in any way knowingly participating in match fixing. Although betting operators are more likely to be the victim rather than the perpetrator there must always be a theoretical level of residual risk and this is the reason the gambling is as highly regulated as it is.

Secondly there are the arrangements agreed between the major betting companies and the major Australian sports. From an integrity perspective the key features are:

- the regular audits of the operators' databases to ensure the players officials and others are not betting on their own sports;
- early advice about suspicious betting patterns;
- agreements about the exchange information in the course of investigations; and
- consultation on betting types, specifically with the intention of protecting the integrity and reputation sport.

These simple but effective agreements were negotiated directly between the sports and sports bookmakers.

Two aspects are worthy of note. The agreements require consultation between the sport and the betting provider on the propriety of any particular bet type before its introduction. This is particularly important because of one of the main areas of concern is around the integrity of bet types that can be influenced by one person and yet not affect the overall outcome of the game. This is obviously an area bookmakers are sensitive to, and this will be a main point of discussion with the sports and, of course, gambling regulators whose approval is ultimately needed, in the next year.

Another of the features of the agreements is the provision of information regarding suspicious betting patterns.

Bookmakers and bet exchanges are at the front line in being able to detect and alert the sports and gambling regulators about possible match fixing. Bookmakers are already part of an alert system deployed by the International Cricket Council whereby any concerns are relayed to its Investigative Unit located in London. Likewise, FIFA

is entering arrangements with betting providers to provide an early warning system of anything untoward in relation to betting on the World Cup.

But looking at Australia, the question arises of what happens if we do detect suspicious betting patterns. What happens afterwards?

In the case of cricket and the AFL, they have developed specialist integrity units which have a high level of forensic and investigative skills - in the case of cricket the Unit is staffed by former senior police officers - who are able to receive and respond appropriately to suspicions arising from the betting pattern.

However that is not the case for most other sports and, although the State and Territory gambling regulators have a degree of expertise in this area, it is suggested the missing link in the sports betting integrity chain is a dedicated Sports Integrity Investigation Unit.

This would help close the regulatory circle for the protection of sports. Australia has the licensing checks and monitoring of betting operators, it has the protocols for the exchange of information, it has the monitoring and reporting of suspect transactions but what is needed is a single national body that has the necessary skills-base to be able to effectively investigate and prosecute on any instances of match fixing.

It is suggested such a body need not be large, but it must be staffed by personnel with the appropriate forensic and investigative skills. Its function would be to act as the principal point of contact for both sports and betting providers, the community and other stakeholders with regard to any concerns about improper practice. It could also develop an education and "best practice" advice function, to keep providers and sports alive to new developments.

Whilst this unit is well within the capacity of sports bodies to set up themselves, it is suggested that consideration be given to establishing this as an independent government body.

By virtue of being a government agency, it is better able to establish government-to-government connections with relevant international agencies.

Secondly it may well be desirable that this unit be vested with particular powers of investigation. For example, an issue of some concern is the proposal that the AFL players permit the AFL to review their telephone records. This is a very intrusive control. Instead, this is the kind of investigative power that could be vested in the sports integrity unit as part of its enabling legislation, as this is the kind of power that is more appropriately given to a form of law enforcement agency than a sports administration body.

It must be recognised that there is always residual risk. If an offshore criminal gang is looking to fix the results of an Australian sporting event, it can do regardless of whether Australian betting operators are fielding on the result, or whether it places bets with them.

Betting providers are more than willing to do all we can do address issue and help the active management of the risks by the sporting bodies.

4 the question of race funding and product fees.

Online bookmakers support the recommendations made in the draft report.

The draft report identified the divide between Queensland and New South Wales and the rest of the country and, if it may be put crudely, the rest of the planet. One aspect of this dispute is now the subject of court action.

We suggest it is no coincidence that Qld and NSW are the two jurisdictions who refused to have any meaningful consultation with the bookmakers. It need only be observed that operators didn't even know the proposed rate until six weeks before the commencement of the New South Wales race fields scheme.

It is understood there are some concerns among sections of the racing industry about what would happen to current payments of product fees should Sportsbet be successful in its challenge against the New South Wales legislation. Online bookmakers have repeatedly said they are ready and willing to pay a fair product fee *with or without the presence of valid supporting legislation.* This is something we have been offering to do since 2003.

Our approach, from the outset, has been to seek a fair outcome. We were open to various fee models, but have suggested that racing authorities should take the opportunity to look at a fee based on revenue rather than turnover for the reasons that were outlined in the previous submission and which are recited in your draft report. We were open to any structure that delivered a fair outcome. Since then, our preference has hardened towards a revenue formula as adopted by the majority of states and territories and as proposed by you in your draft report.

Racing authorities of the other states have had exactly the same concerns as New South Wales and were cautious about the arguments put by corporate bookmakers. But whenever we have received a fair hearing – be it with racing authorities, sporting bodies or regulators – and our arguments are considered on their merits we have ended up with a revenue outcome.

How is it working?

In October, Thoroughbred Racing South Australia reported strong growth through a combination of product fees, taxation reform and rationalisation and cost cutting. It moved from a loss of $2.1 million in 2007/08 to a profit of nearly $6.8 million in 2008/09. It was reported that the biggest factor in the improved performance was the race field contributions from the bookmaking sector which boosted gross revenue by $9.2 million for the nine months of the year for the for which the contribution was paid.

Notably, it was also reported that Unitab's funding also increased up by $2 million - a practical illustration of the benefits of competition. South Australia is said to be budgeting for the net contribution to grow by a further $2 million this financial year

In June this year, Racing Victoria Ltd issued a media release indicating that in the 2008/09 year they were on target to receive a net total of $234 million from the Tabcorp joint-venture and other wagering operators - an increase of 19 million or nearly 9% on the previous year. In 2009/10 RVL was expecting a further increase of $14 million or nearly 6%. The media release went on to note that corporate bookmakers and betting exchanges were making a further contribution through direct sponsorship of clubs and events which also assist in supporting prizemoney levels.

RVL has expressed its satisfaction with the operation of a fee scheme based on revenue.

It has been reported that New South Wales has claimed RVL would change to a turnover model if it could. This is contrary to views expressed by the CEO of RVL.

Claims have also been made that the increase in funding was due to Victoria's special access to gaming machine profits. Again, the CEO of RVL has stated several times that this was not the case, and that over $8 million of the $9 million increase was from the improved wagering receipts.

The argument, especially from NSW, has been that corporate bookmakers are unfairly taking market share from totalisators, to the detriment of racing.

(The fallacy in the argument about "better returns" from totalisators versus bookmakers was addressed in the earlier submission).

Is this so? If this is the systemic, structural problem that NSW claims, this is an effect that should be visible nationally. But instead the figures point to problems that are New South Wales-specific.

The Australian Racing Factbook of 2007/08, sets out betting figures from the early 1990s, including totalisator turnover growth. What this shows is that over the past five years there has been an average national growth in totalisator turnover of some 12%. Some states have exceeded this - for example Western Australia's turnover has grown by 46% - and Victoria has achieved the average 12% growth. But over that period New South Wales lags the rest of the country with a -3% growth. Even if the E.I. year of 07/08 is taken out of the assessment, the four-year TAB growth rate in New South Wales is still the lowest in the country at 4% over the five years.

If regard is had to totalisator turnover over the past 20 years, it will be seen that TAB betting turnover in Australia has been in a consistent low growth pattern for almost all of that time. The period covers both before and after the advent of corporate bookmakers. TAB growth rates have not been significantly impacted by corporate bookmaking.

National TAB turnover has not fallen since the arrival of competition. In fact jurisdictions allowing more bookmaking competition have achieved some of the highest TAB growth rates in the nation.

By comparison the protective jurisdictions such as New South Wales have generally performed poorly in both the TAB and bookmaking sectors. Not only has NSW totaliser growth on thoroughbred racing been in decline (or only shown modest growth) over the past five years, but New South Wales bookmakers experienced a 20% decline in turnover over the same period.

When regarded had to these facts, and the poor state of New South Wales racing as evidenced by the small race fields, there is a concern that corporate bookmakers are simply being used as scapegoats to disguise wider policy failures in the administration of racing in New South Wales. The problems with racing in New South Wales are caused by policy failures far more extensive than simply cross-border betting.

The statistics show that competition stimulates market growth, and the corporate bookmakers have created new turnover and grown the racing market.

It has also been argued that corporate bookmakers are successful because they exploit tax advantages, have a lower cost structure, do not provide the same level of funding to the racing industry, and operate in a more relaxed regulatory environment. These are exaggerated claims.

Let us quickly dispelled the arguments about tax, once and for all. Prior to the introduction of the GST Northern Territory tax rates were about the middle of the field. There were jurisdictions that were lower and there were jurisdictions that were higher.

Betting taxes were one of the taxes adjusted as a result of the introduction of the GST. The States approached it in different ways - some reduced the turnover tax by the effective equivalent of the GST, in other words .5 of 1%. Others decided to keep the tax rates where they were, and rebate the GST.

This means regard must be had to *effective* tax rates to get a true picture. Until recently, the Northern Territory taxed racing bets at .33% of turnover plus GST - an effective tax rate of 8.3%. This is compared with jurisdictions such as Victoria, Western Australia or the ACT where GST was rebated.

Take Victoria, for example. After allowing for a rebate of GST, and 0.1% dedicated to the Bookmakers Development Fund, the effective tax rate for a Victorian bookmaker during the material period was 0.9%.

It is difficult to understand how a difference of .06% is sufficient to ground an allegation of "tax arbitrage", particularly when regard is had to the costs of doing business in the Northern Territory.

As to a lower cost structure, critics too often ignore our high computer and systems costs but more importantly overlook our high customer acquisition costs. Unlike those operators that have the benefit of retail outlets or in the case of on-course bookmakers have (or a least used to have) the racing industry bringing the clients to them, online bookmakers must use often expensive ways of attracting customers and keeping them. Online bettors are usually sophisticated are quite likely to have accounts with 3, 4 or more operators. Accordingly given our reasonably high fixed cost structure and the pressure on margins, it is difficult to see how this was a major factor for success for corporate bookmakers.

Bookmakers' payments to the industry are the same as anyone else's, particularly now the product fees schemes have been put in put in place.

Finally the Northern Territory is somehow tagged as a relaxed regulatory jurisdiction because it allows its betting providers to, for example, take "tote odds" bets or to bet on elections. As you observed in your draft report, tote odds betting is in fact allowed by a majority of the states and territories including Victoria, and is not the function of some rogue or renegade jurisdiction.

Since the release of the draft report some commentators have insisted that the "Commission has got it wrong", and that it has failed to appreciate the importance of totalisators to Australian racing. Often, reference has been made to studies conducted last century, in the 1950s and 1960s to support this position. It need only

be observed that these studies were conducted before the advent of cross-border betting and so have little weight in today's policy conversation.

Likewise these commentators have pointed to the importance of "tote-only" betting in other countries to justify a privileged position being given to local TAB's. It need only be observed (as shown by the ARB Racing Factbook) that of the four leading "tote-only" countries, the USA Japan and Hong Kong have all reported negative prize money growth over the past six years. Only France has experienced positive growth.

It is also significant that these countries have enormous "black market" bookmaking operations. Indeed Hong Kong is home to some of the largest "unlicensed" bookmaking operations in the world. Rather than being examples of the success of "tote-only" betting, these jurisdictions actually show the benefits of the Australian model whereby all sections of the market make a fair contribution to the cost of racing.

Bookmakers had hoped that with the release of the draft report, there might have been some change in approach by New South Wales and Queensland as they understood they were alone in their position of defending what is self-evidently a discriminatory scheme. There has been no sign of it. This colours the bookmakers' response to the question of a national scheme regulation, and importantly the proposal for an independent national pricing Tribunal.

5. Scope for a national scheme of regulation.

There are two areas for discussion. The first is scope for basic regulatory and responsible gambling controls to be subject to agreed national standards; the second is the proposal for a national independent pricing Tribunal to set product fees for racing.

All major online bookmakers support in principle, national responsible gambling and similar controls. Obviously there are some areas where agreement on national schemes of regulation are more likely in comparison to others. For example, it was proposed earlier that as far as possible technical standards for online gaming should be something agreed between the states. This appears reasonably uncontroversial and something that is able to be the subject of agreement.

Then there are areas that are a little more problematic. Our support is for common and genuine responsible gambling initiatives – not, as the Commission identified in its draft report in the case of the ban on inducements, a thinly disguised attempt to provide competitive protection for its local betting providers. In other words, we would look to evidence-based schemes.

Likewise bookmakers would expect genuine review and reform of present restrictive practices. In almost all cases changes made to regulation prompted by the advent of online gambling have proven to be sound on their merits, as underlined by the fact that they have eventually been copied by other jurisdictions.

The more important question is around the commission's draft recommendation for a national independent pricing Tribunal.

The Commission is no doubt aware this is a far-reaching recommendation but it appears to be the one that is the best or at least "the least worst" option for resolving the current impasse caused by New South Wales and Queensland.

In broad terms, it appears there are three options for resolving the present problem.

The first is that New South Wales and Queensland change their minds and agree to a more sustainable fee.

Queensland has the opportunity to review its decision and its attitude will be come clearer shortly. However there is little confidence that Racing New South Wales under its present leadership is able to change its position.

The benefit of this option is that the racing industry remains in control of its own destiny.

The second option is litigation. The present case is focused on a constitutional challenge. There are clearly other avenues open for legal challenge including action under trade practices laws. There is also a high likelihood of lengthy and expensive appeals.

Under this option, millions of dollars is spent on wasteful litigation leading to years of uncertainty. Under this option, racing's destiny is shaped by the courts.

(In relation to litigation, it is noted that this has been the only way bookmakers have been able to achieve meaningful reforms. Despite arguments, policy reviews, and even court decisions, there has been an unwillingness to afford bookmakers their basic legal rights. Hence, while bookmakers remain open to discussion and a fair and equitable compromise, they are not prepared to just walk away from their legal rights in order to reach a compromise at any cost.)

This option is in play now.

The third option tries to answer the question of how to avoid the dislocation caused by the legal dispute that will play out over the next few years.

In the submission earlier this year, this Association proposed that the question be referred to the ACCC or indeed be the subject of a specific reference by the Productivity Commission in the hope that if someone of stature and independence was able to explain to the racing industry exactly where the boundaries are in terms of their legal and market obligations, a fair outcome might still be negotiated.

The dismissive and contemptuous way the draft Report has been received dashes these hopes.

The Commission's proposed solution sets out an immediate and simple mechanism to fix the problem.

The difficulty is of course that it takes away the fee-setting power from the racing authorities of all States and Territories, when this situation is largely brought about by the wilful blindness of New South Wales. It's a very unfair outcome when the majority of the states and territories have done the right thing, put aside there innate caution around dealing with corporate bookmakers, and actually considered the arguments on their merits.

Nevertheless, on balance, a national and independent national pricing Tribunal is the most effective way of resolving the current impasse as quickly as possible. The

principal benefit is that a Tribunal can set a fee, whereas a court can only strike down an unlawful fee. A Tribunal can say what it is; a court can only say what it is not.

In giving support, it must be underlined that is conditional on the same terms and for the same reasons as set out by the Commission in its draft report.

Bookmakers have come too far now to accept a cobbled-together State or racing industry representative body that is simply used as a puppet to impose restrictive practices to benefit the main incumbents. Reluctantly therefore we agree that there should be a Tribunal to make the decision provided it is genuinely independent. Bookmakers would support a Tribunal on the terms and with your qualifications proposed draft report.

Thank you for considering these comments. If you would like any further comment or explanation please do not hesitate to contact me.

Kind regards

Tony Clark
Executive Officer
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