



29 June 2012

Raj Malhotra  
General Counsel  
Victorian Commission for Gambling and Liquor Regulation  
GPO Box 1988  
**MELBOURNE VIC 3001**

By email to: [contact@vcglr.vic.gov.au](mailto:contact@vcglr.vic.gov.au)

Dear Mr Malhotra,

*Re: Submission on the use of earphones etc. in gaming machines*

Thank you on behalf of the Gaming Technologies Association and its members for the opportunity to provide comment in relation to the interim ban order banning *“the practice of allowing the use of earphones, earpieces, headphones, headsets or any other device on a gaming machine that converts signals from a gaming machine to audible sound that is delivered to the ear of a person playing a gaming machine and is not designed or intended to assist a hearing impaired person”<sup>1</sup>*.

The Gaming Technologies Association (“GTA”) is a not-for-profit company limited by guarantee, established in 1990 for the purpose of promoting the development of the region’s manufacturing resources.

GTA’s primary members provide gaming technology and equipment in over three hundred jurisdictions worldwide. GTA’s primary members include Ainsworth Game Technology, Aristocrat Technologies, Aruze Gaming, Bally Gaming, International Game Technology, Konami Gaming, Shuffle Master and WMS Gaming.

GTA and its members have amassed vast experience over more than 55 years in all matters surrounding gaming in Australia and around the world; and supply all of Victoria’s new games and gaming machines.

GTA opposes any ban order including the interim ban order made on 12 December 2011 on the basis that no evidence has been provided that supports the order.

On the contrary, many millions of people worldwide routinely utilise earpieces for listening to music and other entertainment purposes. GTA considers any ban order which prevents gaming machine players from utilising common methods including the use of earpieces to permit them to enjoy the entertainment facilities provided by gaming machines as potentially discriminatory and inappropriate.

---

<sup>1</sup> Text of interim ban order

The interim ban order cited no evidence that players would be likely to experience any harm from choosing to utilise earphones in gaming machines. The reality, of course, is that should players decide to utilise their own earphones whilst playing a gaming machine then they would not block out external noise; they would not reduce the capacity for venue staff to engage; they would not be more likely to play gaming machines alone; and the likelihood of problem gamblers entering a state colloquially referred to as 'the zone' would not be increased.

It is unclear to GTA why this particular means of delivering entertainment to hospitality patrons has been apparently persecuted by imposing an interim ban. However, GTA and its members understand and support every means of addressing problem gambling. Accordingly, GTA suggests that the wording of the interim ban order be addressed to reflect what we believe is its intention.

The interim ban order refers to *audible sound that is delivered to the ear of a person playing a gaming machine*. Clearly this is an over-representation of an apparent perceived problem, as its literal interpretation would include ambient sound from the speakers located in every gaming machine through which a range of player information is delivered including the incidence of payouts and alerts.

The interim ban order should have referred to the use of 'exclusive' noise-cancelling headphones which might conceivably have the effect outlined in the interim ban order of blocking out external noise. The use of earpieces commonly used to listen to music and for other entertainment purposes will not, of course, block out external noise.

GTA opposes the interim ban order made on 12 December 2011 and opposes any fixed term ban order. GTA recommends that venues be directed to consider whether any player utilising 'exclusive' noise-cancelling headphones might be susceptible to problem gambling issues.

Yours sincerely



**Ross Ferrar**  
Chief Executive Officer