



**Submission to the
Productivity Commission**

Public Inquiry into Gambling
25 September 2009

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Introduction

The Gaming Technologies Association (GTA) welcomes the opportunity to provide further input to the Productivity Commission's inquiry into gambling. This submission builds on the comments made in GTA's previous submissions in relation to jurisdictional overlap and technology.

General Conclusions/Recommendations:

Evidence Based Decisions

Regulatory reform in the gaming industry, as with any other industry sector, should be based on credible evidence and consultation.

It has been the experience of GTA members that all too often decisions are made in response to emotive triggers in the absence of sound evidence and appropriate industry and expert consultation.

It is the GTA's view that the most effective way of responding to gambling concerns is through a credible evidentiary process involving appropriate research and expert industry advice. This approach would in turn support balanced well informed responses from governments and regulators alike.

National Standards are Necessary

After ten years since this matter was first highlighted by the Productivity Commission the time is well overdue for genuine national standards to be implemented for gambling in Australia.

National standard setting would overcome unnecessary jurisdictional differences, unnecessary delays that are costly to the industry and to jobs, and unnecessary red tape that creates uncertainty – stifling innovation, investment and delaying the implementation of measures which address the needs of various audiences.

A National Authority

National Standards need to be accompanied by national implementation.

For this to succeed in Australia, a National Authority should be established and be responsible for all regulations and policy development relevant to the gaming industry.

This Authority will need to have the requisite power to enforce accountability, transparency and consistency across all Australian jurisdictions.

While we recognise that this is not a simple task, Australia's gaming jurisdictions have demonstrated over this past decade that they cannot coordinate their activities or address issues important to the industry and to the public in a consistent and timely manner.

An Expert Advisory Committee

Australia has many eminent experts who could assist Governments and regulators in gaming policy development and implementation.

GTA members, for example, have a wealth of national and international experience that could be drawn on to address issues relating to gaming policies and approvals – particularly in the area of gaming technologies.

The GTA suggests that an Industry Expert Advisory Committee be established to assist Governments in their deliberations of gaming regulation and policy development and assist the work of a new National Authority.

Jurisdictional Consistency & Cutting Red Tape

This submission highlights examples of jurisdictional inconsistency that have imposed significant and unnecessary costs on industry with no apparent regulatory benefit or purpose.

GTA members operate in a global environment. Investment decisions are made against global benchmarks.

Inconsistent regulatory approvals and differentiations across Australia's jurisdictions impose significant regulatory burdens and uncertainty that ultimately cost Australian jobs and investment.

GTA emphatically supports the need for national regulatory consistency and minimising unnecessary red tape across Australian jurisdictions.

The impact of jurisdictional inconsistencies

The development and supply of game software and hardware is a complicated process, made exponentially more difficult in Australia by jurisdictional differences as outlined in Appendix 1 on page 10.

*"Obtaining approval for game software can take between three months and three years. Obtaining approval for game hardware typically takes three years. Given that approval must be obtained from each regulator, these delays will be repeated in each jurisdiction in which approval is sought."*¹

Appendix 2 on page 11 provides a process diagram of the basic complexity and some of the resources involved in game development and supply. Where jurisdictional inconsistencies exist, this process is dramatically escalated and the subsequent need for software inventory control and related administrative measures becomes critical.

¹ GTA submission to the Productivity Commission, 31 March 2009, page 27

Wherever subsequent change is required, detailed analysis must be completed to assess whether one, some or all versions of the respective software must be redeveloped and quality assured, at a significant cost and distraction in terms of resources and time.

The impact of mandated configuration changes

Wherever whimsical change is mandated to the configuration of operational gaming machines in a particular jurisdiction, software retrofits may be required. The process involves retrieval of the original software which must be redesigned, redeveloped, retested (by the supplier's Quality Assurance function and also by licensed external test laboratories), resubmitted to the respective regulator and approved for distribution.

Every affected gaming machine must then be physically visited by a licensed technician, who must enter the machine, break security seals and record their destruction, locate/remove and replace computer chips, re-secure and test the machine before re-establishing connectivity with the respective electronic monitoring system and logging all of the above activity. Repeating, this applies to *every affected gaming machine*.

This process consumes significant time and other resources for questionable benefit. In the event that any change is suggested in any jurisdiction, legislators and regulators should be mindful of the impacts of their decisions on venues, suppliers and their various support resources. No single individual should be placed in a position where it is possible to exert personal control and all decisions should be subject to transparent impact assessments.

State Politics

Since its submission to the inquiry on 31 March 2009, GTA has noted that various State politicians have actively sought to publicise gambling for apparent electoral purposes by declaring their intention to "lead the way" in "tackling problem gambling" without apparent evidence or consultation with key stakeholders, including the following:

- On 18 May, South Australia said that it "leads the way on responsible gambling"².
- On 28 May, Queensland was "leading the way in the prevention of problem gambling"³.
- On 13 July, Tasmania had "the best harm minimisation practices in Australia"⁴.
- On 10 September, Victoria was "taking the lead nationally on tackling problem gambling"⁵.

There should be a consistent and national approach. Fragmented actions such as those outlined above lead to inconsistencies. A better approach would be for leading minds to reach consensus on a single, coordinated approach.

² "SA leads the way on responsible gambling", press release, Premier of South Australia.

³ "Bligh Government moves to reduce problem gambling with new technology", press release, Queensland Minister for Tourism and Fair Trading.

⁴ "Addressing Problem Gambling", press release, Treasurer of Tasmania.

⁵ "Young men warned about irresponsible gambling", press release, Victorian Minister for Gaming.

Technology

In our submission of 31 March, GTA strongly expressed the view that technology can provide solutions – and over time, gaming machines can be configured using developing modern technology to address a wide range of issues.

Gaming machines in (say) ten years' time will be very different to those operating today – primarily because the componentry from which they are manufactured is changing rapidly. Many, if not all, of the gaming machines operating today will be replaced over the next ten years in the normal course of events.

Addressing the issues

GTA is of the view that the only valid approach to appropriately address compulsive behaviour involving gaming machines is through the innovative application of technology to address such behaviour “in the moment”, focusing on the direct awareness of the person involved. It is not appropriate for opportunistic add-on accessories to provide “sidebar” displays or parasitic devices.

Politics and critics

Problem gambling triggers emotive reactions and opportunistic responses rather than cool headed, well informed debates and government policy responses. There are probably few less informed debates in the Australian political landscape than that on problem gambling – and in particular, with respect to gaming machines. The views of people who enjoy playing gaming machines and intend to continue doing so with no known risk of any detriment, do not appear to be considered at all in such debates. There is little evidence that any criticism to date involves genuine consideration of all relevant issues and appropriate responses.

GTA's concern is that State governments and regulators implement spontaneous measures in order to “be seen to address” pressing political issues without appropriate evidence or consultation.

Much of the uninformed comment and jurisdictional inconsistencies evident in current debate is counterproductive. All parties involved in the debate should seek an appropriate and mature agreement on valid, evidence-based approaches to address the real issues. This would result in a unified and powerful *national* approach to Australia “leading the way on responsible gambling” with innovative, world's best, evidence-based consensus.

Expert input

Gaming is very much a growth industry on a global basis. GTA members provide gaming machines in around 300 jurisdictions around the world. We think it's reasonable for politicians and regulators to draw on our members' very significant experience to provide solutions to any issues involving gaming machines.

In the absence of responsible comprehensive consultation, what's needed is a national authority with real power to require accountability of State and Territory legislators and regulators. This national authority should review all past and pending decisions and should withdraw measures that cannot be demonstrated to be appropriately evidence-based and have failed to address defined objectives.

Genuine National Standards

An appropriate starting point is the Australia – New Zealand Gaming Machine National Standard (GMNS), which GTA has previously provided to the Commission. After more than 10 years of purported consultation, much of which has not involved suppliers or operators, the GMNS is perceived as a standard bearer for bureaucratic procrastination. A national authority could review and set aside minor jurisdictional differences and work towards rational principles for the future delivery of a valuable and accepted national recreational activity for all Australians, in keeping with current and future community values and commercial realities.

Such an approach would be consistent with related national requirements including accreditation requirements for liquor licences and would be in keeping with modern global regulatory "best practice".

As outlined in our submission of 31 March, the "National Standard" is far removed from its descriptor. Each jurisdiction created and continually expands its own appendix to the Standard, an exercise which could reasonably be described as disdainful of the process.

As also outlined in our submission of 31 March, (unmodified) gaming machines comply with an array of national and international standards including:

- EMC emission and immunity testing to EN 55022, AS/NZS CISPR22, FCC Part 15, EN 61000-3-2, EN 61000-3-3, EN 61000-4-3, EN 55024.
- Electrical Safety testing to AS/NZS 60950.1, AS/NZS 60950-1, AS/NZS 61347.1, AS/NZS 61347.2.3, IEC 60335-2-82.
- Climatic testing to IEC 60068-2-1 (-5°C), IEC 60068-2-2 (+45°C), IEC 60068-2-3 (90% RH at +35°C).

It is noteworthy that the above standards on emission and immunity testing, electrical safety testing and climatic testing do not vary between Australian jurisdictions – whereas the GMNS carries a burden of differences expressed as appendices for each Australian jurisdiction.

In addition to the "National Standard" and its Appendices, jurisdictions apply their own "harm minimisation" requirements OUTSIDE the National Standard framework. Some of these requirements are written into appendices, some are documented into separate guidelines, some are specific⁶ and some are general⁷. All are subject to ad hoc rejection decisions, often after costly external laboratory testing has been successfully completed and the approval submission has been provided. Some are "explained" by a blanket statement that any change to a game component is subject to review by the Commission. In these circumstances, no "appeal" or additional discussion mechanism is available.

In many cases, regulators diligently discharge advice from their respective policy sections in respect of specific guidelines and decisions. GTA perceives that these matters are often determined in isolation, without due consideration of potential impacts.

Examples

Example 1: Third Party Equipment

One regulator allows third party equipment to be attached to gaming machines without the Original Equipment Manufacturer's knowledge or consent. Another regulator permits non-original replacement parts (such as game screens) to be fitted without full re-testing or assessment of the operational performance of the modified equipment.

It is highly unlikely in either of these cases that electrical and related testing is being conducted and it is considered very unlikely that the modified operational equipment complies with national EMC emission and immunity, electrical safety and climatic operation standards.

Original Equipment Manufacturers are rightly held responsible for the performance of a gaming machine, whether it is one year old or ten. However, it is wrong that third parties should be permitted to attach or change components as this could negatively impact operational efficiency and integrity of a gaming machine with unknown implications.

Example 2: Duplicate information requirements

During the development of GMNS 9.0 in August 2008, regulators' representatives requested "a separate disclosure of all messages, images or sounds presented to the player which do not provide instructions rules or payscale information or do not provide part of the display of the game." This duplicates various aspects of a normal game submission, creating what members regard as unnecessary information whose purpose is unknown. Regulators advised that this requirement "was inserted into National Standard 9.0 at the direction of CEOs".

GTA mailed correspondence to the CEOs on 18 August 2008, to which no response has yet been received. A copy of GTA's correspondence is attached as Appendix 2 on page 12.

⁶ eg: NSW "Gaming Machines Prohibited Features Register"

⁷ eg: South Australian "Game Approval Guidelines"

Example 3: Failure to consult

At the National Standards Working Party (NSWP) forum on 27 August 2008, regulators proposed a new clause prohibiting congratulatory messages where the win of a play is less than the total credit bet; and that "any audible affirmation associated with the win will be subject to close regulatory scrutiny". Manufacturers pointed out that audible notification routines are already phased according to the scope of the payout and that player fairness would be negatively impacted by failing to notify the player of a payout.

A file note was raised and provided to the NSWP on 10 November 2008, to which no response has been received. A copy of GTA's correspondence is attached as Appendix 3 on page 13.

Example 4: Applying alternative standards

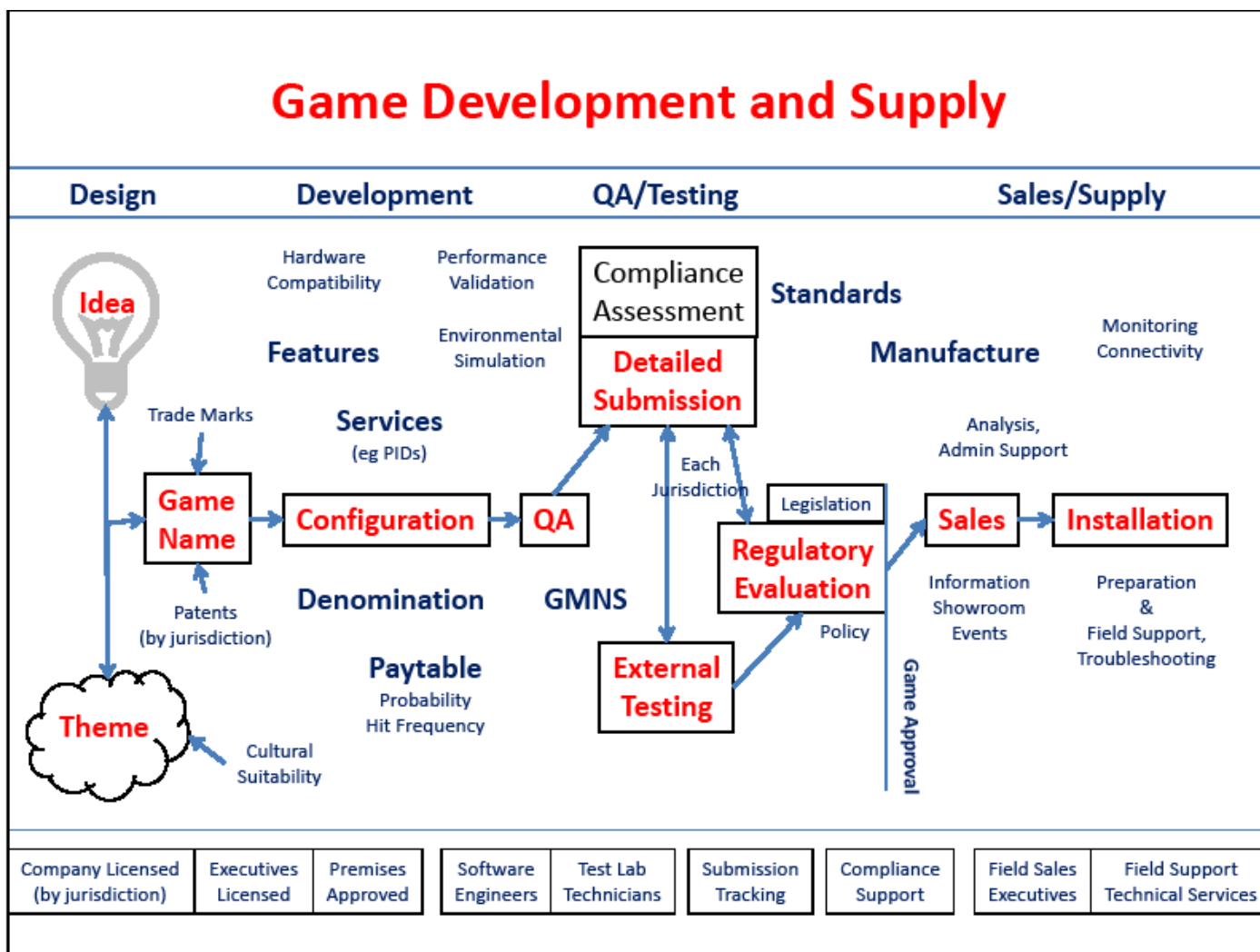
One Australian jurisdiction has recently broken ranks with the National Standards regulators and allowed trials using an existing international standard. The regulator's motivation may be to get approvals through with less development by the manufacturer, but it does not take into account the fact that all Australian manufacturers have already complied with National Standards and carry the huge cost overheads in the existing machines.

Gaming machine manufacturers supply all Australian markets with GMNS compliant machines and the further elevation of jurisdictional inconsistencies as a result of this decision increases the unit cost development burden substantially for all jurisdictions.

Appendix 1: Jurisdictional differences for a sample game

Area	Characteristic	NSW Clubs + Hotels	QLD Clubs + Hotels	QLD Casinos	SA Casino	SA Clubs + Hotels	Vic Casino	Vic C+H Tabcorp	Vic C+H Tatts	NT Casino	Tas Clubs + Hotels	Tas Casinos	
Denomination	1c, 2c	1c denominations for NSW only - linked to lines	1c denomination only for QLS - linked to max bet	Denomination would be from 1c to \$1 - no max bet	Acceptable denominations for ADC - linked to max bet	Acceptable denominations for SAS - linked to max bet	Denomination would be from 1c to \$10 - no max bet	1c denomination only for TAB - linked to max bet	1c denomination only for TAT - linked to max bet	Denomination would be from 1c to \$10 - no max bet	1c denomination only for TSS - linked to max bet	1c denomination only for TSC - linked to max bet	
Lines	100 Line Game	NSW can approve 100 lines for 1c only	Max lines in QLS is 50 - game needs to be changed	Max lines in QLC is 50 - game needs to be changed	Max lines in ADC is 50 - game needs to be changed	Max lines in ADC is 50 - game needs to be changed	Have not ruled whether 100 Lines are acceptable - may have to be changed	Have not ruled whether 100 Lines are acceptable - may have to be changed	Have not ruled whether 100 Lines are acceptable - may have to be changed	Have not ruled whether 100 Lines are acceptable - may have to be changed	Max Lines in TSS is 30 - game needs to change	Max Lines in TSC is 30 - game needs to change	
Maximum Bet	1000 or 500 Credits	Providing the game is 1c only both max bets are fine for NSW. It would be a Bet 10 x 100 line and Bet 5 x 100 Line	500 credits only for 1c would need to have a smaller max bet if 2c was added. It would be a Bet 10 x 50 line and Bet 5 x 50 Line	No max bet limits but still has 50 line limit applied.	1000 and 500 credits are fine but for 50 line only. It would be a Bet 20 x 50 line and Bet 10 x 50 Line	1000 and 500 credits are fine but for 50 line only. It would be a Bet 20 x 50 line and Bet 10 x 50 Line	No max bet limits but still depends on whether 50 line limit applied.	\$5 max bet limits but still depends on whether 50 line limit applied.	\$5 max bet limits but still depends on whether 50 line limit applied.	No max bet limits but still depends on whether 50 line limit applied.	Max Bet completely changed to fit in with 30 Line bet. Cannot exceed \$5	Max Bet completely changed to fit in with 30 Line bet. Cannot exceed \$5	
Feature Trigger	3, 4 or 5 Scatters triggers 15, 25 or 50 free games respectively	Maximum number of free games in NSW is 40. Game to be reworked	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of free games allowed is 25. Will need to be reworked.	Maximum number of free games allowed is 25. Will need to be reworked.	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	
Feature Retrigger	2, 3, 4 or 5 Scatters triggers 5, 15, 25 or 50 free games respectively	Maximum number of free games in NSW is 40. Game to be reworked	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Must be less than 1 in 100 to go over 25 Free games - 2 scatter retrigger will need to be removed	Must be less than 1 in 100 to go over 25 Free games - 2 scatter retrigger will need to be removed	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	Maximum number of Free Games has probability restrictions applied rather than limit. If hits often enough no change required	
Max Prize	Maximum amount that can be won in the base game or free games for any one spin not including progressives. Linked to number of lines and max bet all working with each other to define exactly how the game will be set up	\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation			\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation	\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation	\$42 million theoretical max prize so bets will need to be set to ensure limit is not past. Cannot have truncation	\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation	\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation	\$42 million theoretical max prize so bets will need to be set to ensure limit is not past. Cannot have truncation		\$10,000 so bets will need to be set to ensure limit is not past. Cannot have truncation	
Progressives	3 Levels of standalone progressives - Mega awarded with five of a kind Sym 1 and 2, Maxi awarded with 5 of a kind Sym 3, 4 and 5, and Mini awarded with 5 of a kind A, K, Q, J, 10. Mega Start up \$2500, Maxi Start up \$500, Mini Start up \$100	Number of levels is fine (max of four), each level has a ceiling of \$10,000. Startup amounts fine. Extra progressive options defined in game	Number of levels is fine (max of eight), each level has a specific ceiling defined by a 95-99 confidence interval. Startup amounts fine. Extra progressive options configurable by the system	Number of levels is fine (max of eight), each level has a specific ceiling defined by a 95-99 confidence interval. Startup amounts fine. Extra progressive options configurable by the system	Number of levels is fine (max of four). Mega startup outside suggested limit (Standards indicate ceiling only). Extra progressive options defined in game	Number of levels is fine (max of eight). Mega startup outside suggested limit (Standards indicate ceiling only). Extra progressive options defined in game	Number of levels is fine (max of eight). Startup amounts fine. Ceiling set to maximum of \$42 million	Number of levels is fine (max of eight), each level has a ceiling of \$10,000. Startup amounts fine. Extra progressive options defined in game	Number of levels is fine (max of eight), each level has a ceiling of \$10,000. Startup amounts fine. Extra progressive options defined in game	Number of levels is fine (max of eight), each level has a ceiling of \$10,000. Startup amounts fine. Extra progressive options defined in game	Number of levels is fine (max of eight), each level has a specific ceiling defined by a 95-99 confidence interval. Startup amounts fine. Extra progressive options configurable by the system	Number of levels is fine (max of eight), each level has a specific ceiling defined by a 95-99 confidence interval. Startup amounts fine. Extra progressive options configurable by the system	Number of levels is fine (max of eight), each level has a specific ceiling defined by a 95-99 confidence interval. Startup amounts fine. Extra progressive options defined in game
Standard Deviation	17.5	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF and Manufacturer to provide report to show RTP compliance.	Exceeds limit - ATF and Manufacturer to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	Exceeds limit - ATF to provide report to show RTP compliance.	
Max Prize Hit Rate	1 in 2.5 million	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	Must be within 1 in 7 million. Game meets standards	
Player Info Display	This display has either Top Five bottom five hits or QLD specific material or is not required	No Player information display.	QLD Specific Player Information Display required.	QLD Specific Player Information Display required.	No Player information display.	No Player information display.	Player Information Display required.	Player Information Display required.	Player Information Display required.	Player Information Display required.	QLD Specific Player Information Display required.	Player Information Display required.	
Function Buttons	Gamble/Reserve, Take Win/Start Feature, Collect/Menu, Rules, Info	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Rules	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Info	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Info	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Rules	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Rules	Gamble, TakeWin/Start Feature, Collect/Menu, Info	Gamble, TakeWin/Start Feature, Collect/Menu, Info	Gamble, TakeWin/Start Feature, Collect/Menu, Info	Gamble, TakeWin/Start Feature, Collect/Menu, Info	Gamble/Reserve, TakeWin/Start Feature, Collect/Menu, Info	Gamble, TakeWin/Start Feature, Collect/Menu, Info	
Protocol	X- Series 2, Q-Com, ASP, VLC,	X Series 2	Q-COM	Q-COM	X Series 2	VLC	ASP	VLC	VLC	X Series 2 or ASP	Q-COM	ASP	

Appendix 2: Game Development and Supply – process diagram



Appendix 3: Copy of correspondence to Regulators' CEOs of 18 August 2008

18 August 2008

Messrs Brenton Sleep and Robert Chappell
Australasian Gaming Regulators' CEOs' Forum
C/- Robert Chappell
Director, Office of the Independent Gambling Authority
PO Box 67
Rundle Mall SA 5000

Dear Messrs Sleep and Chappell,

Re: separate disclosure of messages, images or sounds

During the development of Australian/New Zealand Gaming Machine National Standard ("GMNS") Revision 9.0, our members were surprised to find that regulators' representatives requested "a separate disclosure of all messages, images or sounds presented to the player which do not provide instructions rules or payscale information or do not provide part of the display of the game." This duplicates various aspects of a game specific submission, creating what members regard as unnecessary information whose purpose is unknown. Accordingly, GTA objected to the amendment.

The NSWGP response to GTA's objection was that this requirement "was inserted into National Standard 9.0 at the direction of CEOs".

During the development of GMNS Revision 10, GTA has again objected to this requirement on the basis that it "has added massive and unnecessary duplication to the process of submitting games for approval" and this has met with the same response.

Accordingly, GTA requests that its representatives meet with the regulators' CEOs in order to explain in detail what is involved in the process of duplicated submission; and to discuss the purpose of inserting this requirement into the GMNS.

Yours sincerely,

Ross Ferrar
Chief Executive Officer

Appendix 4: Copy of File Note forwarded to NSWP on 10 November 2008

Memo to: File Note
From: Ross Ferrar
Date: 6 November 2008

Re: **Net Loss Notification**

At the National Standards Working Party forum on 27 August 2008, regulators proposed a new clause prohibiting congratulatory messages where the win of a play is less than the total credit bet; and that "any audible affirmation associated with the win will be subject to close regulatory scrutiny".

Manufacturers objected to the proposed new clause and a discussion took place at the Forum around notifying play outcomes. The Working Party agreed to further discussion of the proposal prior to finalising National Standard Version 10 and this has been taking place by email.

The National Standards Working Party has proposed the following:

3.9.57b If the result of a game element or play is a net loss or break even:

- a) the display of a 'congratulatory' message is prohibited, and
- b) the duration of any audible affirmation associated with the game element or play must not exceed 1 second.

After discussion among the GTA's Technical Committee and at the GTA's Board meeting on 6 November 2008, it was agreed that the following is supported:

3.9.57b If the result of a game element or play is a net loss or break even, the display of a 'congratulatory' message is prohibited.

Limits on audible notification are opposed for the following reasons:

1. Player fairness would be negatively impacted by failing to notify the player of a payout.
2. Audible notification routines are already phased according to the scope of the payout and it is the Board's opinion that limits on audible notification would negatively impact gaming machine entertainment value.

(continued overleaf)

Appendix 4: Continued



3. The reasons given for limits on audible notification involve policy opinion only and are therefore not the domain of Technical Standards.
4. Limits on audible notification have been proposed without advancing any evidence that they would assist responsible play.
5. It is the Board's opinion that limits on audible notification would result in unintended consequences, including the encouragement of faster play.
6. It is noted that the Queensland Office of Liquor, Gaming and Racing has considered this issue (Section Q3.33 of the Gaming Machine National Standard Queensland Appendix Version 9.0.1). It is the Board's opinion that the approach adopted is applicable nationally.

Ross Ferrar
Chief Executive Officer
