



2 December 2011

Pre-commitment
Office of Gaming and Racing
PO Box 18055
Collins Street East
MELBOURNE VIC 8003

By email to pre-commitment@justice.vic.gov.au

Thank you for the opportunity to provide input to the public consultation process in lieu of the Victorian pre-commitment discussion paper. Attached is a copy of the completed discussion paper and below are some additional comments by way of background and summary.

About the Gaming Technologies Association (GTA)

GTA is a not-for-profit company limited by guarantee, established in 1990 for the purpose of promoting the development of Australia's manufacturing resources.

GTA's members provide gaming technology and equipment to hospitality venues in over 300 jurisdictions worldwide, 8 of which are in Australia. GTA's Board members include Ainsworth Game Technology, Aristocrat Technologies, Aruze Gaming Australia, Bally Australia, IGT (Australia), Konami Australia, ShuffleMaster Australasia and WMS Gaming Australia. All GTA members are public companies or part of a public company.

These are the people who are responsible for the design, development, testing and submission of all games and machines for approval in Victoria. The responsibility for delivery of changes to gaming machines rests solely with them.

Summary of this submission

The technology to deliver voluntary pre-commitment is not terribly complicated. However, difficulties with implementing such change arises in implementation rather than technology.

GTA suggests that a technology stakeholder group comprising representatives of venues, regulators, the Monitoring licensee, (pre-commitment suppliers if appropriate) and GTA's Technical Committee focus on issues during the development process, in particular:

- cost-efficiency
- player access and ease-of-use
- technology interface complexities and demarcation
- coordination of quality assurance, testing and submission for regulatory approval
- increased game play functionality and entertainment for pre-commitment users
- the propensity of the final solution to assist players to minimise the risk of experiencing harm from gambling

The process of implementation

GTA would like to express some concern regarding jurisdictional differences and related matters.

The Victorian Government's commitment to implement voluntary pre-commitment on all gaming machines in Victoria no later than 2015-16 is clearly understood. However, the final functionality design will have an immense impact on the specialist development resources required and therefore the schedule required for delivery.

During the schedule period, other Australian jurisdictions may impose requirements on gaming machines and their operating environments which will also impose demands on the specialist development resources required to develop new gaming machines or redevelop existing gaming machines.

It is important that jurisdictional differences do not result in duplicated development, testing and implementation processes so that new requirements are delivered cost-effectively. For this reason, the technology stakeholder group should carefully oversee requirements from other Australian jurisdictions as well as Victoria's.

In addition, gaming machines in Victoria have been proven over many years to operate with probity and integrity. Any interface with, or communication to, any gaming machine should be subject to intense technical scrutiny and testing in order to ensure that operational integrity is preserved and enhanced.

Yours sincerely



Ross Ferrar
Chief Executive Officer

Pre-commitment discussion paper

Response form



Interested persons and organisations are encouraged to provide submissions commenting on all or any of the parts of the pre-commitment discussion paper.

The Department is particularly interested in responses to the questions posed throughout the discussion paper. Submissions are not required to answer any, or all, of these questions and may address other related issues.

The Department will not consider any parts of submissions that seek to revisit the Government's determination that pre-commitment should be voluntary for players to use and must be available on all gaming machines in Victoria.

This response form reproduces the questions posed throughout the pre-commitment discussion paper. The Department welcomes use of this form in part or in full. It is not a requirement for submissions to use this form.

Submissions should be forwarded, in writing, to:

Post: Pre-commitment
Office of Gaming and Racing
PO Box 18055
Collins Street East
MELBOURNE VIC 8003

or

Email: pre-commitment@justice.vic.gov.au

For further information regarding this discussion paper, please contact:

Susan Graham
Project Manager – Pre-commitment
Telephone: (03) 8684 1972.

Your details

Name	
Organisation (if applicable)	
Email address	
Address	
Telephone	

Please note:

Submissions will be published on the Department of Justice website.

Any information that is commercial-in-confidence should be identified in your submission and a request should be made to withhold the information from publication.

For the purposes of this document, commercial-in-confidence material or information may be taken to include material or information:

- the publication of which would disclose information from a business, commercial or financial undertaking, and the material or information relates to:
 - trade secrets
 - other matters of a business, commercial or financial nature and the disclosure of the information would be likely to expose the undertaking unreasonably to commercial disadvantage.

In deciding whether disclosure of material or information would expose an undertaking unreasonably to commercial disadvantage, for the purposes of the above, persons providing submissions should give consideration to whether the material or information:

- is already in the public domain
- would be generally available to competitors
- could be disclosed without causing substantial harm to their competitive position.

Each submission will be considered on a case-by-case basis.

Part 1: What is pre-commitment and what will it do?

Potential pre-commitment features and processes

Q.1. To what extent will the proposed features and processes be simple and easy for players to access and use?

Q.2. To what extent will the proposed features and processes assist players to minimise the risk of experiencing harm from gambling?

Q.3. Can the proposed features and processes be easily implemented and are they cost-efficient (that is, are they the most effective mechanisms that impose the least cost to industry)?

Q.4. What, if any, privacy issues might arise for players, and how can these be mitigated?

Q.5. What, if any, impacts on venue staff might arise from the proposed features and processes?

Incentives and other factors that might influence the take-up and use of pre-commitment

Cashless gaming

Q.6. What are the benefits, costs and/or issues associated with linking pre-commitment and cashless gaming:

- for players?

- for venues?

Q.7. Does cashless gaming create risks for gamblers or encourage problematic gambling behaviour? Please provide explanations for your answer.

Loyalty programs

Q.8. What are the benefits, costs and/or issues associated with linking pre-commitment and player loyalty programs:

- for players?

- for venues?

Q.9. Does linking loyalty programs with pre-commitment create risks for gamblers or encourage problematic gambling behaviour?
Please provide explanations for your answer.

Q.10. How can loyalty programs be structured in a way that is complementary to pre-commitment or that actively encourages the take-up of pre-commitment?

Other factors that might influence take-up and use of pre-commitment

Q.11. What other incentives could be provided in conjunction with pre-commitment to encourage its take-up and use?

Q.12. What, if any, elements could discourage players from taking up or using pre-commitment? What incentives could be provided to mitigate this?

Q.13. Please provide any additional ideas to:

- encourage players to take up pre-commitment
- encourage venue operators and their staff to promote pre-commitment to patrons.

Part 2: What are the technical options for pre-commitment?

Networked

Q.14. What are the key implementation issues for a networked pre-commitment system?

Q.15. What are the ongoing costs and benefits of a networked pre-commitment system?

Q.16. What are the advantages and disadvantages for players of a networked pre-commitment system?

Monitoring network infrastructure

Q.17. What are the costs and benefits of using the monitoring network to deliver a networked pre-commitment system?

Separate network infrastructure

Q.18. What are the costs and benefits of using separate network infrastructure to deliver a networked pre-commitment system?

Non-networked

Q.19. What are the key implementation issues for a non-networked pre-commitment system?

Q.20. What are the ongoing costs and benefits of a non-networked pre-commitment system?

Q.21. What are the advantages and disadvantages for players of a non-networked pre-commitment system?

Part 3: Who should provide pre-commitment?

Responsibilities

Q.22. What do you see as the responsibilities of the pre-commitment provider?

Monitoring licensee

Q.23. What are the key issues associated with the monitoring licensee providing pre-commitment?

Q.24. What, if any, are the advantages and disadvantages associated with the monitoring licensee providing pre-commitment?

Single provider

Q.25. What are the key issues associated with a single provider, other than the monitoring licensee, providing pre-commitment?

Q.26. What, if any, are the advantages and disadvantages associated with a single provider, other than the monitoring licensee, providing pre-commitment?

Multiple providers

Q.27. What are the key issues associated with pre-commitment being provided by multiple providers?

Q.28. What, if any, are the advantages and disadvantages associated with pre-commitment being provided by multiple providers?

Thank you for taking the time to share your views with us.