



11 April 2006

The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
Dickson ACT 2602

Dear Sir/Madam

I refer to an application for authorization A30243 lodged by the Association of Australian Bookmaking Companies Inc.

I have noted the request by this body to collectively bargain on behalf of its members with racing control bodies to publish and use race field information and similar rights.

Firstly I wish to point out that no legislation of the kind referred to in the application has yet been enacted in New South Wales. Accordingly, until such legislation is introduced into the Parliament by the Government it is difficult for Racing NSW to comment on the procedures which should be adopted in the administration of the legislation.

However I would point out that Racing NSW, along with the NSW Government and the Controlling Authorities for the other two codes of racing, recognizes the NSW Bookmakers Cooperative Ltd as the body representing bookmakers in this State. In addition it is noted that this Cooperative is a member of the Australian Bookmakers Association which represents bookmakers at the national level.

The AABC represents only a small number of bookmakers who are based predominately in the Northern Territory and whose operations would appear to be regulated by the NT Government rather than by the Racing Industry as occurs in the majority of other States and Territories.

Without detailed knowledge of any legislation which might be enacted in New South Wales the opinion of Racing NSW is that it should continue to liaise with the Australian bookmaking fraternity through the established and well tested channels rather than with splinter groups representing a small minority of bookmakers.

RACING NSW (ABN 86 281 604 417)

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In the circumstances this Board does not support the abovementioned application.

Yours sincerely
RACING NSW

A handwritten signature in black ink, appearing to read 'P N V'LANDYS'. The signature is stylized with a large initial 'P' and 'N'.

P N V'LANDYS
CHIEF EXECUTIVE