



Deacons

RACV Tower
485 Bourke Street
Melbourne VIC 3000
Australia
GPO Box 4592
Melbourne VIC 3001
DX 445 Melbourne
Tel + 61 (0)3 8686 6000
Fax + 61 (0)3 8686 6505
www.deacons.com.au

6 August 2007

By email: joanne.palisi@accc.gov.au
danielle.staltari@accc.gov.au

Ms Joanne Palisi
Director
Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Attention: Danielle Staltari

Your Ref: N93059
Our Ref: 2620605

Other Offices

Brisbane
Canberra
Perth
Sydney

**Independent
Affiliated Firms**

Hong Kong
Indonesia
Malaysia
People's Republic of
China
Singapore
Taiwan
Thailand
Vietnam

Dear Ms Palisi

**Harness Racing Victoria
Exclusive dealing notification N93059**

We refer to your telephone discussion with Andrew Bell in which the Australian Competition & Consumer Commission (**ACCC**) sought further background information in relation to the above notification given to the ACCC (**Notification**) by Harness Racing Victoria (**HRV**). The following information is provided to assist you with your inquiries.

In the Notification, HRV identified six corporate bookmakers (**corporate bookmakers**) that would be directly affected by the conduct described in the Notification. Those six bookmakers are often referred to as 'corporate' bookmakers. As far as HRV is aware, the majority of their business is conducted principally by the internet and via telephone. They are each based outside of Victoria.

There are other interstate entities aside from the corporate bookmakers that currently take bets on racing events and, in particular, on Victorian harness racing. These include the "totalisers" or "TOTEs", namely the exclusive wagering licence holders in each State and Territory in Australia and on-course bookmakers located outside of Victoria.

06/08/2007

For the avoidance of doubt, if HRV intends to enter into arrangements requiring notification with any other entity other than the corporate bookmakers, HRV will lodge a separate notification(s) for that conduct.

Any rebates that HRV receives from the corporate bookmakers are limited to harness racing on the Victorian tote. It does not include, for example, bets taken or bet-backs placed in respect of thoroughbred racing or greyhounds.

HRV is not aware of the specific arrangements that corporate bookmakers use to place bet-backs on Victorian harness races (or any other form of racing or betting).

HRV is not in a position to summarise the views of the corporate bookmakers (or other industry participants) on the proposed conduct but HRV notes that the ACCC will be separately contacting those parties in the course of its inquiries.

Please do not hesitate to contact me should you have any further questions.

Yours faithfully



Richard Lewis
Partner
Deacons
Contact: Andrew Bell
Direct line: +61 (0)3 8686 6274
Email: andrew.bell@deacons.com.au