

Staltari, Danielle

From: Staltari, Danielle
Sent: Friday, 10 August 2007 10:11 AM
To: 'Bell, Andrew'
Cc: Deacons - tom.jarvis@deacons.com.au; Palisi, Joanne
Subject: Interested party submissions received in response to the Harness Racing Victoria Submission [SEC=UNCLASSIFIED]

Categories: SEC=UNCLASSIFIED
Attachments: RWWA.pdf; Betfair.pdf; AIBA.pdf
ACCC Classification: SEC=UNCLASSIFIED

Dear Andrew

Please find attached for your comment submissions from Betfair, the Australian Internet Bookmakers Association (AIBA) and Racing and Wagering Western Australia (RWW) which the ACCC has received in response to the notification lodged by Harness Racing Victoria.

In providing comments on these submissions it would be appreciated if HRV could particularly respond to/clarify the following:

- The public benefit and public detriment arguments raised by Betfair, the AIBA and RWWA.
- Will it be possible under the Race Field Approval Agreement for the bookmakers (listed in the notification) to place bet-backs and lay-offs with wagering service providers other than the Victorian TAB? If the answer is yes, is it correct to assume that bet-backs and lay-offs placed with other wagering service providers will not be counted towards the rebate proposed by HRV, but those bet-backs and lay-offs placed through the Victorian TAB will be counted towards the rebate?

I note that in your letter of 9 August 2007, you state that any other wagering service provider can obtain race fields for Victorian harness racing from HRV, provided that it has been approved by HRV under section 2.5.16A(1) of the Gambling Regulation Act. What factors does HRV take into account in granting approval to wagering service providers who want to obtain race fields for Victorian harness racing? In considering whether to grant approval to other wagering service providers (ie bookmakers not listed in the notification or betting exchanges) will it be open to these providers to negotiate with HRV the term of access to the race field data including the provision of other rebates or discounts on the price paid for acquiring race field data from HRV?

If a bookmaker has an "imbalanced book" for a particular race is it current practice that they place bet-backs and lay-offs on:

- that particular race in which they have an imbalanced book for and/or other racing events such as a thoroughbred race.

Is it correct that the rebate to be offered to the bookmakers (listed in the notification) will be calculated on all bet-backs and lay-offs placed by the bookmakers in a month with the Victorian TAB *on all harness racing in Australia*?

If yes, could HRV please explain why the rebate is calculated on this basis and not on the basis of all bet-backs and lay-offs placed by bookmakers on *Victorian harness racing*?

- Further what will be the likely impact on other harness racing clubs throughout Australia?
- Could HRV please address the arguments raised by Betfair (see pages 9-10) and AIBA (see pages 9 – 10) regarding pooling of bets on harness racing?

In order to progress the ACCC's consideration of this notification I would be grateful if you could please provide a response to interested party submission by no later than Thursday 16 August 2007.

Please note that a copy of this email will be placed on the ACCC's public register.

Should you have any questions please contact me on 02 6243 1362.

Regards

Danielle

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RWWA.pdf (655
KB)



Betfair.pdf (4 MB)



AIBA.pdf (2 MB)