



28 April 2008

Gambling Policy
Department of Treasury & Finance
GPO Box 1045
ADELAIDE SA 5001

Rec'd	29/04/2008
Reg No	JFOSD2754
File No	J&F06/0749
Action Officer	Kym Della-Torre
Response Due By	13/05/2008

Dear Sir

Re: Issues Paper on the Regulation of the Bookmaking Industry

I refer to the public release of an issues paper on the regulation of bookmakers and to your department's invitation to make submissions to address the questions contained in the paper.

Further to the questions raised in relation to bookmakers' acceptance of bets made by telephone or other electronic means (including the internet), SA TAB Pty Ltd (**SA TAB**) wishes to point out that in light of the Government's obligations to SA TAB as set out in Part 3 of the Approved Licensing Agreement between the Treasurer of South Australia and SA TAB dated on or about 11 December 2001, as amended (in particular section 11.2(b) of the agreement), SA TAB considers that the licensing and/or approval of bookmakers to accept bets made by telephone or other electronic means together with the enforcement of the rules regulating bookmakers' acceptance of such bets should continue to be carried out by the Commissioner and/or the IGA.

Without adequate regulation by the Commissioner and/or the IGA in relation to this matter, we are concerned that the Government's obligations under the Approved Licensing Agreement could unintentionally be breached by the racing industry.

Please do not hesitate to contact me should you require any further information in relation to this matter.

Yours faithfully

Grant Harrison
General Manager

Legal/Treasury001

