



Gary Banks AO
Chairman
Productivity Commission
GPO Box 1428
Canberra City ACT 2601

12 February 2010

Dear Mr Banks

Thank you for the opportunity to respond to the claims made by Responsible Gaming Networks in their submission of 21 January 2010.

As Australia's peak body representing gaming machine manufacturers, we take our responsibility to support the development of evidence-based gaming policy seriously. We are committed to enhancing the vitality and sustainability of the gaming industry as a whole. Our positions are therefore informed by a long-term view and do not seek to promote the proprietary products or interests of any individual vendor. As our members represent the overwhelming majority of the Australian gaming machine market by volume and value, the GTA has a deep understanding of machine technology and developments both here and overseas.

We are pleased to have an opportunity to correct the factual errors and misrepresentations made in the submission by Responsible Gaming Networks, namely:

- The GTA makes no claim that connecting ancillary equipment to electronic gaming machines is "difficult and fraught with dangers". GTA's members routinely provide gaming machines that incorporate various types of equipment connections. Further, we have never contended that there is any particular difficulty involved in attaching pre-commitment devices to such machines. Both of these claims are false.
- The Gaming Standards Association's (GSA) GDS protocol is well known to the GTA. Most of our members are also GSA members. Our submissions and representations made to the Commission during the current inquiry have been informed by the full range of GSA protocols and standards.
- GSA's GDS standard refers to "peripheral devices", excluding the software and hardware created by the gaming machine manufacturer. In most cases, such "peripheral devices" are incorporated into the overall gaming machine at the point of assembly, at the manufacturer's premises. To be absolutely clear, the term "peripheral devices" in this context refers to internal devices (such as note acceptors, printers, game play screens, etc) and not to "bolt-on" devices.

- Player tracking units are external devices and by no means do all Australian gaming machines include a player tracking unit. The cost of installing player tracking units on gaming machines, or modifying existing player tracking units, would be massive.
- The GTA has always acknowledged that there are a number of technologies in the market that are capable of delivering player warning messages. We have however sought to focus on the question of effectiveness, that is, which solution is likely to be most effective in reducing problem gambling without unduly impacting the amenity of the majority of recreational players.
- We remain firmly of the view that to be effective, warning messages must be delivered in the context of players' activity and on the game play screen rather than on a separate device, however configured. We note that Responsible Gaming Networks does not seek to address questions of efficacy and impact.
- GTA reiterates our concerns, outlined in our submission of 18 January 2010, in relation to electrical safety, electro-magnetic and radio frequency emissions, climatic requirements and magnetic interference. Responsible Gaming Networks has not addressed the substance of these concerns, which remain valid and are appropriately raised by the GTA.

Thank you again for the opportunity to place these facts on record. The GTA would be pleased to provide any further information you may require, or provide any additional assistance to the Commission.

Yours sincerely

Ross Ferrar
Chief Executive Officer