



June 29, 2011

Committee Secretary  
Joint Select Committee on Gambling Reform  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

**Inquiry on interactive and online gambling and gambling advertising**

Dear Committee Secretary,

As with any gambling related matter, regulation and oversight is paramount.

In line with our comments from prior correspondence with the Committee, we believe the key to this discussion must involve the **provision of a platform that allows both offline and online/interactive gaming vendors to reference player information, betting limits, exclusions, etc because only clear means would strongly serve the needs of regulators.**

**A working model** of the scheme should include a number of desirable features such as the following:

- **Comply with privacy** principles and laws for the customer while also protecting the venue's privacy and independence
- **Be flexible and simple** (user-friendly)
- **Be easy to integrate** with existing industry programmes promoting responsible gambling , and with existing systems used in large venues while not imposing unnecessary cost and inconvenience on smaller venues
- **Be cost effective** and not impose a financial burden on the industry. We believe that an investment of about \$8 million on hardware infrastructure plus \$1 million per annum in overheads is not excessive to regulate an industry that handles billions in revenue every year
- **Be evidence-based.** That is to allow for ongoing assessment of problem gambling and the effectiveness of the system, through having effective data collection mechanisms within the system

With all due respect, we can help focus discussion about such a platform because when Gambling Reform was in the news after the last elections, we wanted to know how our



software solutions might address that issue and so we produced a the aforementioned “working model”, making it already available today.

Our QiBet platform (<http://bet.qilynx.com/>) already provides these capabilities, and while our prior comments apply to the offline environment investigated in the previous inquiry, it is just as applicable (if not more so) in an online/interactive environment.

It essentially implements a web-browser interface for access by users to input and update betting limits, and a number of programming interfaces that would allow [online] venue operators to integrate their systems with ours to constantly check and update monies played -- thus providing a mechanism to track and regulate the limits specified.

Just like a credit bureau, except for [online/offline] gaming/gambling.

The site allows gamblers to be uniquely identified and allows for personal information to be cross checked while at the same time protecting gamblers' privacy. Since the website bears the responsibility of identification, gamblers would only need to provide a means of identification (driver's license for example).

With such a platform in place, local operators would be obligated to reference such information to the benefit of players.

Moreover, overseas operators whose parent governments can agree on terms with the Australian government may come under the same “certification”.

Australian punters, then, would have better assurance of protection and privacy, from both a personal and social viewpoint.

Gambling and compliance can easily be monitored with the system as individuals would have access to the information provided by the [online] venues in which they gambled and could easily check against personal records.

Most importantly, basing discussion on QiBet brings focus to the topic - in a way that no amount of debate with assumptions and hypothetical arguments can match - because we answer the question: “How would regulating online/offline gambling work if it were implemented today?”

Respectfully yours,

Marcus Uy  
QiLynx Systems