



The Australian Bookmakers Association Pty Ltd

ABN 68 066 699 607

The Manager
National Self-Exclusion Register Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne Victoria 8010

Dear Sir/Madam

I write in response to your consultation regarding the recovery of costs for the soon to be implemented National Self Exclusion Register (**NSER**).

The Australian Bookmakers Association notes that a detailed submission has been made by the Victorian Bookmakers Association regarding this matter which adequately and succinctly represents the thoughts of the national executive.

The lack of a collated national expected usage measure makes it difficult for us to properly assess the impost this new system will place upon our members.

Whilst on-line trading continues to grow and interactive telephone usage falls, in NSW for example, it could be said that wild usage fluctuations are likely to occur at particular times of the racing year. This would be due to major carnivals in Sydney (Autumn - March to April, Spring - September to November) and in Melbourne (Autumn - February to March, Spring - October to November) which could wildly affect the cost recovery calculation. The NSER system enquiry totals would be vastly different at other times of the year from a racing perspective.

Significant sporting events such as World Cup football, Olympics, NRL Grand Finals and VFL Grand final, Superbowl and NBA betting demands would also have a significant part to play in the traffic going through the NSER at varying times of the year.

For those reasons, the ABA strongly supports a request for a detailed analysis of the first levee calculations and a subsequent review of the cost recovery formulae introduced.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Les Mellowship'.

Les Mellowship
National Executive Officer
4/2/2022