

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]
Date: Wednesday, 18 October 2023 4:00:54 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[image007.gif](#)
[image008.gif](#)
[Letter to ACMA - Fast Codes Solutions - 18.10.23.pdf](#)

Dear [REDACTED]

Thank you for your email. As foreshadowed in our meeting on 13 October 2023, please see **attached** Sportsbet's proposal.

We would be happy to further discuss any aspect of it with you at the ACMA's convenience.

Kind regards

[REDACTED]

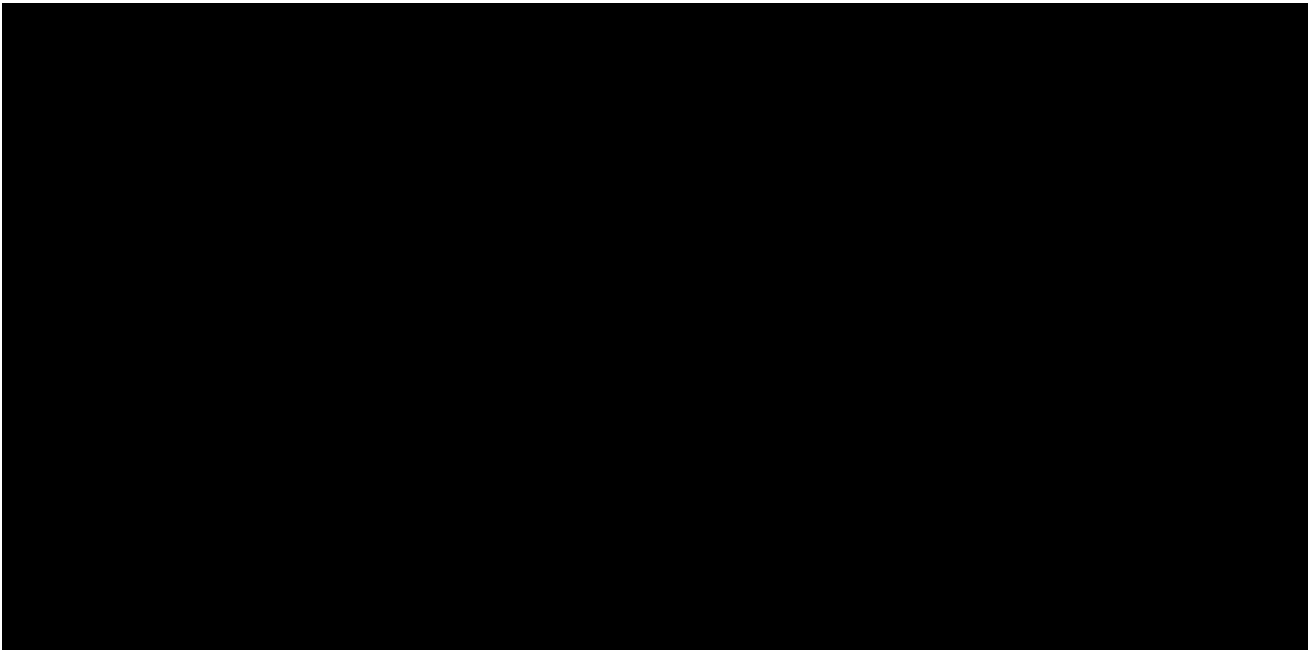
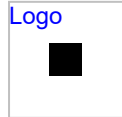
[REDACTED]

ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



From: [REDACTED]

Sent: Thursday, 28 September 2023 10:53 AM

To: [REDACTED]

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]

[REDACTED]; [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Thank you, and sorry for the slow confirmation. Sportsbet can make either of those times work so happy for ACMA to select any preference. Would you mind circulating a Teams invite when convenient please?

Kind regards

[REDACTED]

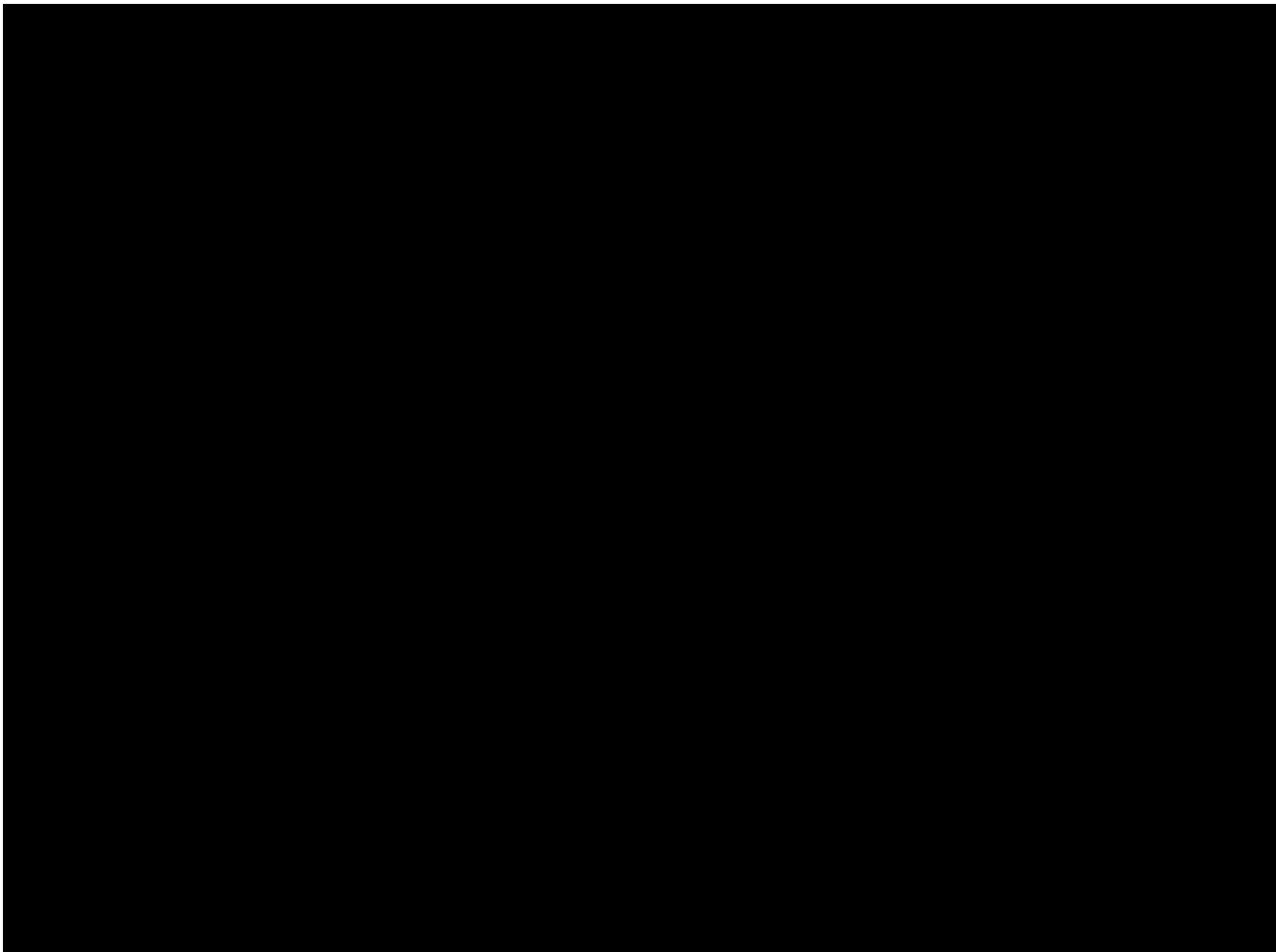
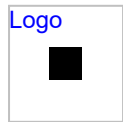
[REDACTED]

ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



[REDACTED]

From: [REDACTED]

Sent: Monday, 25 September 2023 3:08 PM

To: [REDACTED]

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]

[REDACTED]; [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Further to below, confirming Sportsbet is available to meet on 13 October. Would 10am suit?
We are happy to make whatever time suits ACMA best.

Kind regards

[REDACTED]

[REDACTED]

ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



From: [REDACTED]

Sent: Monday, 25 September 2023 1:03 PM

To: [REDACTED]

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]

[REDACTED]; [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Thank you for your email, and apologies for the slow reply (I was on leave last week). We will check availability for 13 October and revert.

Kind regards

[REDACTED]

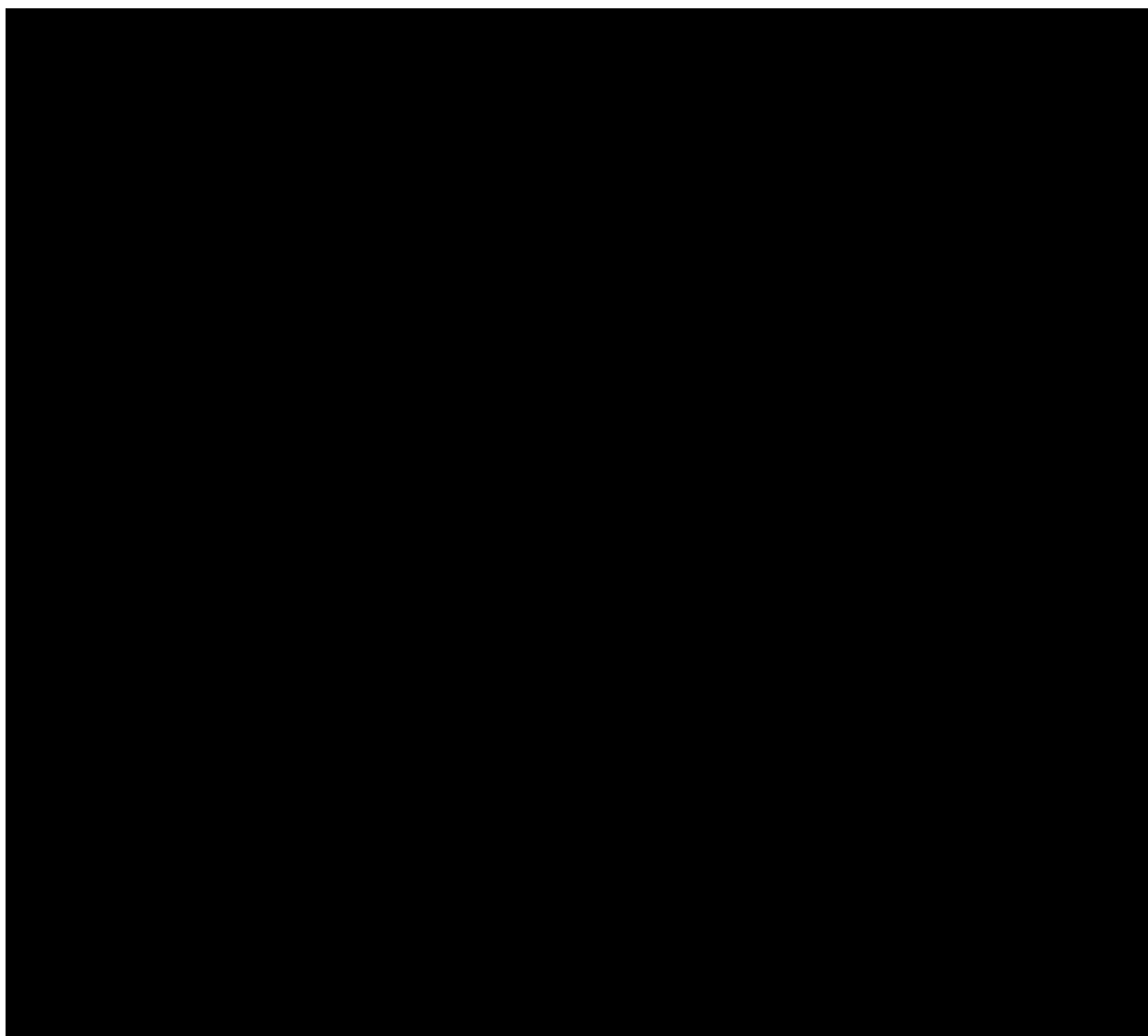
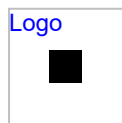
[REDACTED]

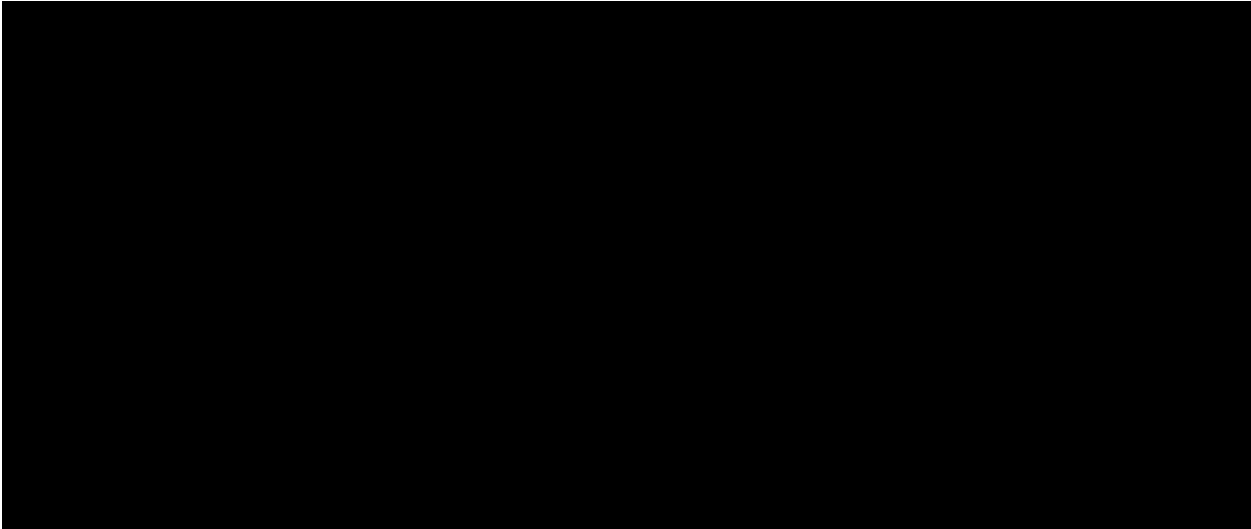
ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo





From: [REDACTED]
Sent: Wednesday, 20 September 2023 6:18 PM
To: [REDACTED]
Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]
[REDACTED]
Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Following on from Monday's call, we wanted to take the opportunity again to thank the ACMA for everyone's time and the valuable feedback provided to Sportsbet.

Sportsbet is fully committed to strict compliance with the *Interactive Gambling Act* and is likewise committed to bringing the Fast Code service into compliance with the ACMA's preliminary view.

We also reiterate that this matter continues to have the focussed attention of Sportsbet's senior executive, who would like to assure the ACMA that the initial feedback has been heard and is being actioned in [REDACTED]. We will be in a position to discuss in much greater detail when we next meet on 16 October 2023, at a time convenient to the ACMA. We would be grateful if you could advise of your availability on that date.

In the meantime, Sportsbet assures the ACMA that this matter continues to be a major priority with teams devoted to this work and that Sportsbet is confident the ACMA's feedback will be reflected in the detailed proposal put to the ACMA.

Thank you again for the ongoing consultative and constructive dialogue with the ACMA's representatives. If you have any queries, please feel free to contact us any time.

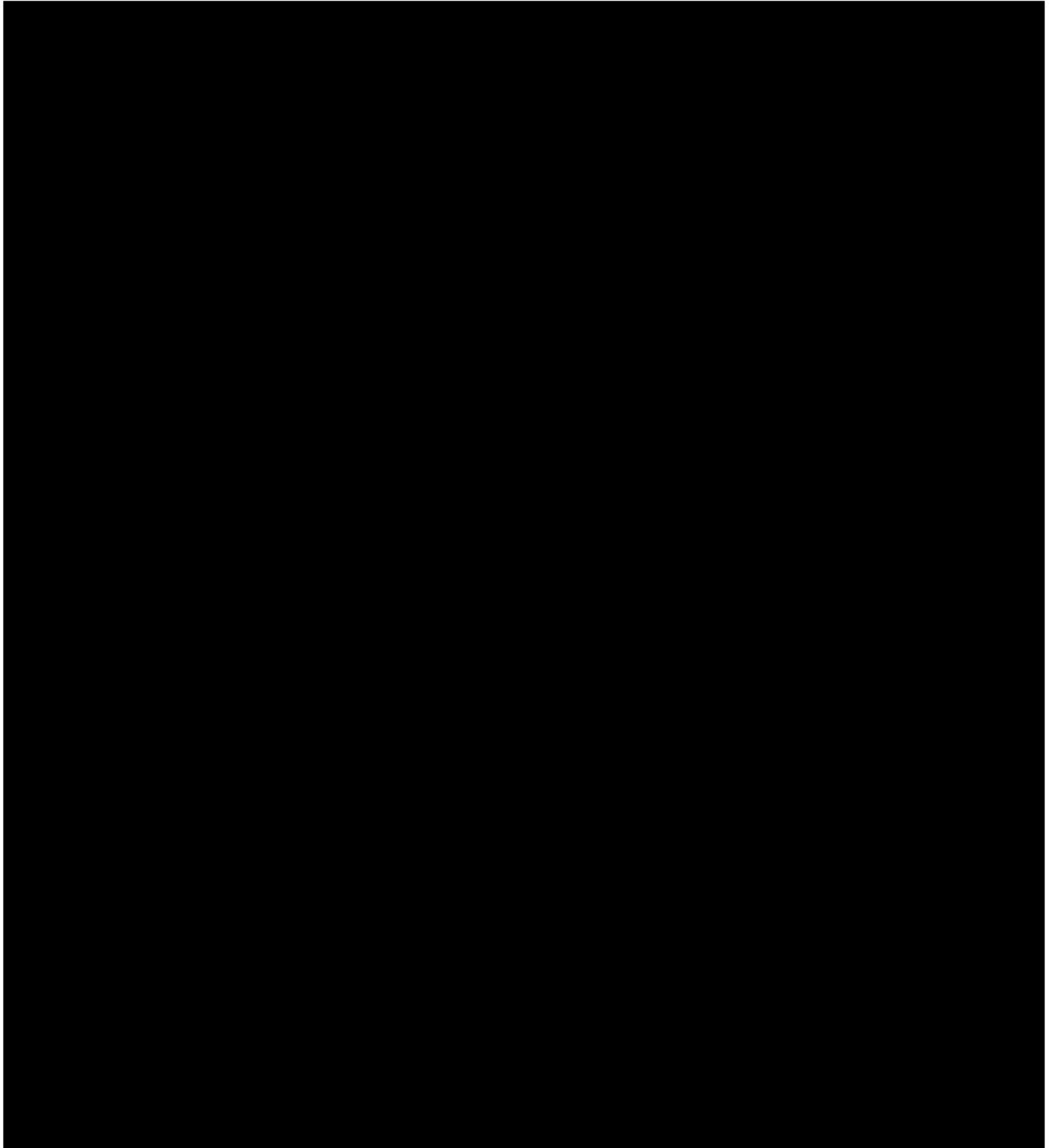
Kind regards

[REDACTED]

[REDACTED]
ACTING GENERAL COUNSEL
[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



From: [REDACTED]

Sent: Friday, 15 September 2023 3:09 PM

To: [REDACTED]

Cc: [REDACTED]; [REDACTED]

[REDACTED]; [REDACTED]; [REDACTED]

[REDACTED]
Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Further to my email below, I can now confirm that Sportsbet is available to join the ACMA for a discussion regarding our letter of 11 September and processes involved in [REDACTED] of this kind on Monday, 18 September at 1pm.

Would you like to circulate a Teams invite? We would be happy to circulate an invite but would be restricted to Zoom unfortunately (which I understand is not preferred).

Kind regards

[REDACTED]
ACTING GENERAL COUNSEL

[REDACTED]
Level 15, 367 Collins Street, Melbourne VIC 3000

Logo

From: [REDACTED]

Sent: Friday, 15 September 2023 7:14 AM

To: [REDACTED]

Cc: [REDACTED]; [REDACTED]

[REDACTED]; [REDACTED] [REDACTED]

[REDACTED]

Subject: RE: Response to ACMA preliminary findings [SEC=OFFICIAL]

Dear [REDACTED]

Thank you for your email, and apologies for the slow reply. I was out of the office yesterday.

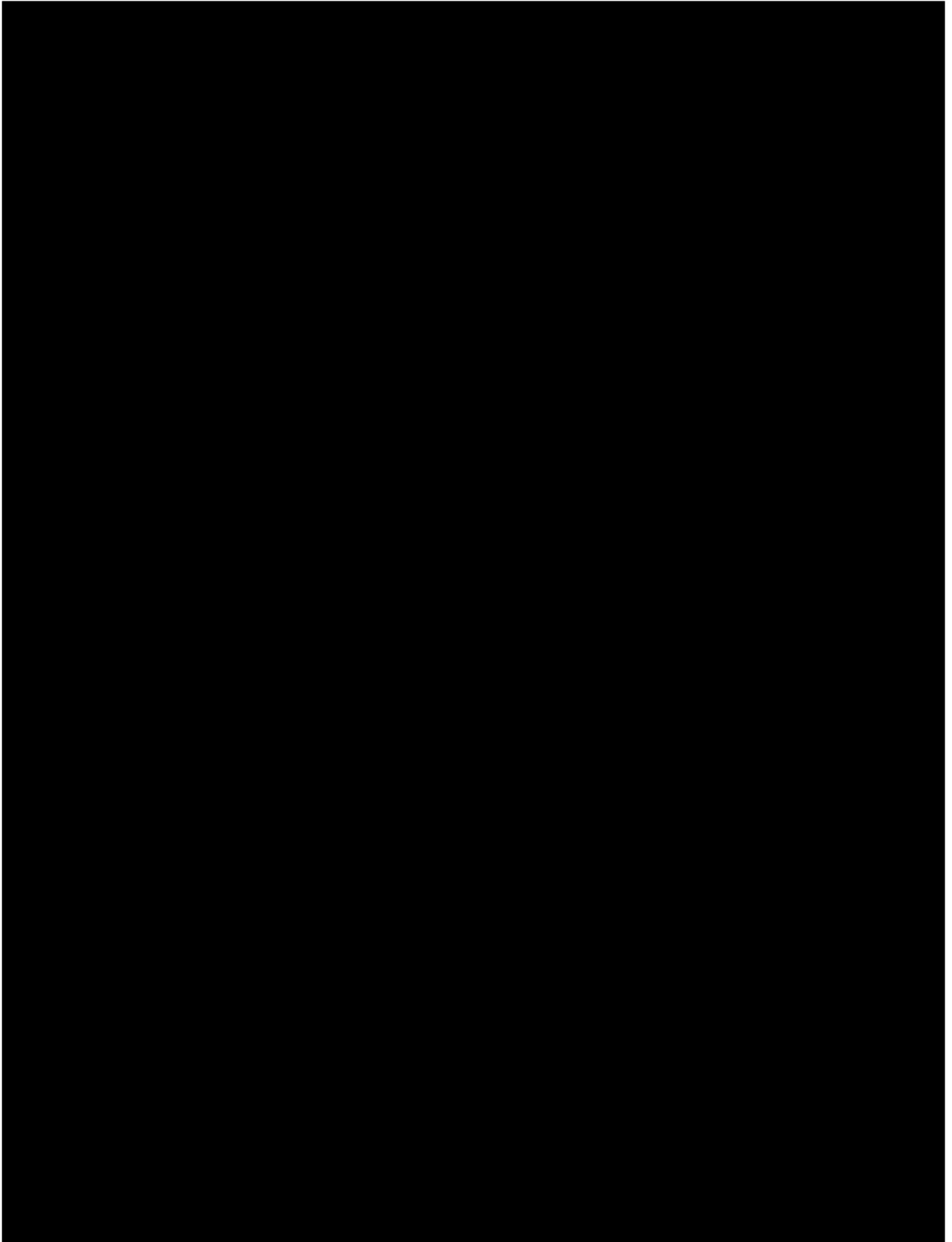
We are checking availability for a call and will revert as soon as we're able to this morning with Sportsbet's availability. This will most likely be in the early part of next week and aiming for Monday in one the available slots that suit the ACMA.

Kind regards

[REDACTED]
ACTING GENERAL COUNSEL

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Monday, 11 September 2023 5:46 PM

To: [REDACTED]

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]

[REDACTED]; [REDACTED] [REDACTED]
[REDACTED]

Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED],

Following on from the below and our discussion on 30 August 2023, please see **attached** letter from Sportsbet in response to the ACMA preliminary finding dated 15 August 2023.

As set out in the attached letter, once you have had a chance to consider, and/or if you have any immediate questions, please let us know and we would be happy to discuss.

Kind regards

[REDACTED]

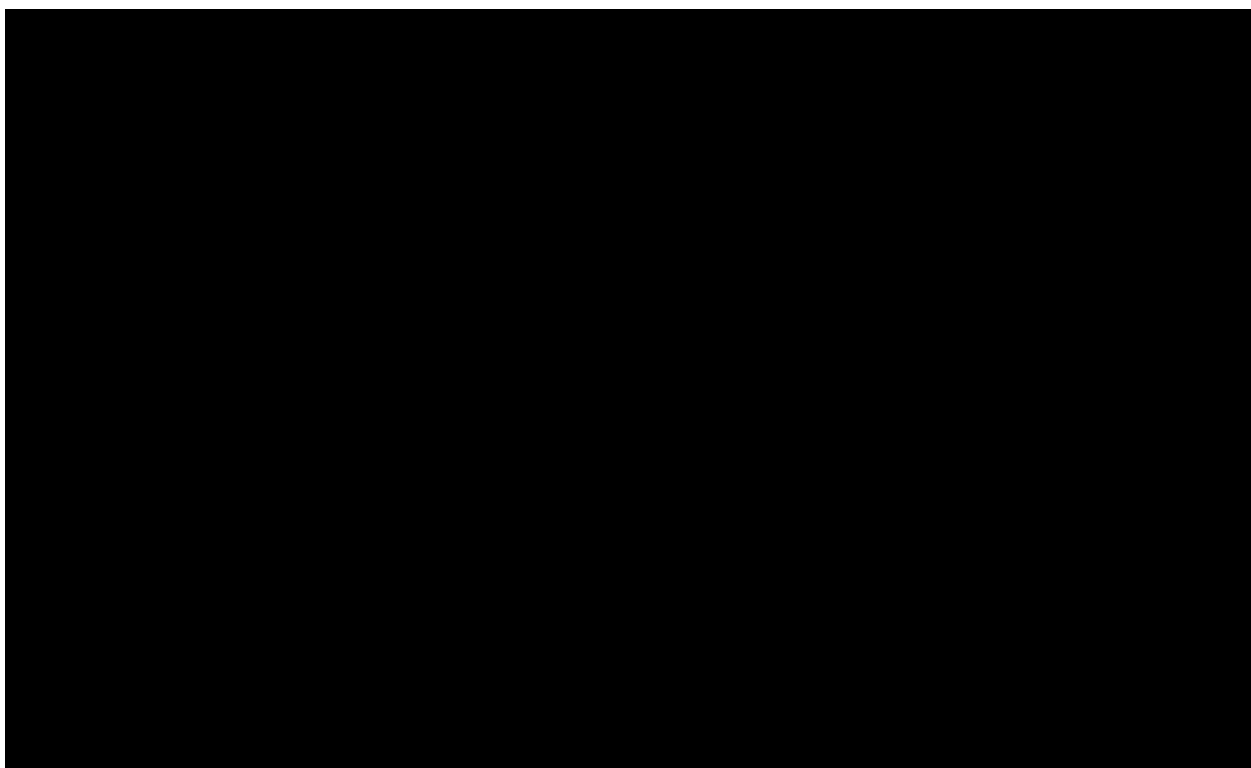
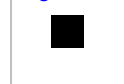
[REDACTED]

ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



[REDACTED]

From: [REDACTED]
Sent: Tuesday, 5 September 2023 6:42 PM
To: [REDACTED]
Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]
[REDACTED]
Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED]

Thank you again for your time discussing this matter last week, and thank you also to [REDACTED], [REDACTED] and [REDACTED]. Sportsbet appreciated the opportunity to meet with you.

There were some questions raised during the discussion which were taken on notice with Sportsbet to respond to the ACMA on. Please see below Sportsbet's responses to those questions.

We are otherwise continuing to work towards providing the ACMA with a submission by 11 September 2023. If you have any further queries prior to that, don't hesitate to contact us.

1. Is a Fast Code available for every live sporting event?

[REDACTED]

2. Is it possible for two different customers to be allocated a different code for the same event?

[REDACTED]

████████████████████

Logo



From: [REDACTED]

Sent: Wednesday, 30 August 2023 2:44 PM

To: [REDACTED]

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]

Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED]

If it assists, we thought it would be useful to provide the below high level draft proposed agenda for today's call.

If you have any queries or concerns, please let us know.

No.	Item	Who
1.	Introduction and context	[REDACTED] – Sportsbet
2.	Allocation of codes – brief summary	[REDACTED] – Sportsbet
3.	Discussion regarding the ACMA’s primary concerns	ACMA
4.	Open discussion regarding [REDACTED] [REDACTED]	ALL

103

██████████

ACTING GENERAL COUNSEL

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



From: [REDACTED]
Sent: Wednesday, 30 August 2023 8:09 AM
To: [REDACTED]
Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]
[REDACTED]
Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED]

Thanks for your patience. Confirming Sportsbet would be grateful to meet with the ACMA at 4pm today.

Sportsbet representatives will be myself, [REDACTED] (Chief Legal & Risk Office), [REDACTED] (General Manager, Product), [REDACTED] (General Manager, Technology Delivery) and [REDACTED] (General Manager, Customer Operations, TBC).

We will circulate an invite now. I can only include a Zoom link but we'd be happy to try and change this today to Teams and likewise happy if ACMA amend the Invite to Teams (which Sportsbet can access).

Thanks and kind regards

[REDACTED]

ACTING GENERAL COUNSEL

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



From: [REDACTED]
Sent: Tuesday, 29 August 2023 6:05 PM
To: [REDACTED]
Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]
[REDACTED]

Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED]

Thank you for your email, and confirming the ACMA's agreement to meet and providing availability. We are just finalising Sportsbet availability asap this evening and will revert as soon as possible (noting the first available time slot is tomorrow afternoon and we're conscious of ACMA team members' other commitments and that availabilities may change).

We would be happy to share an invite once timing known.

Kind regards

[REDACTED]

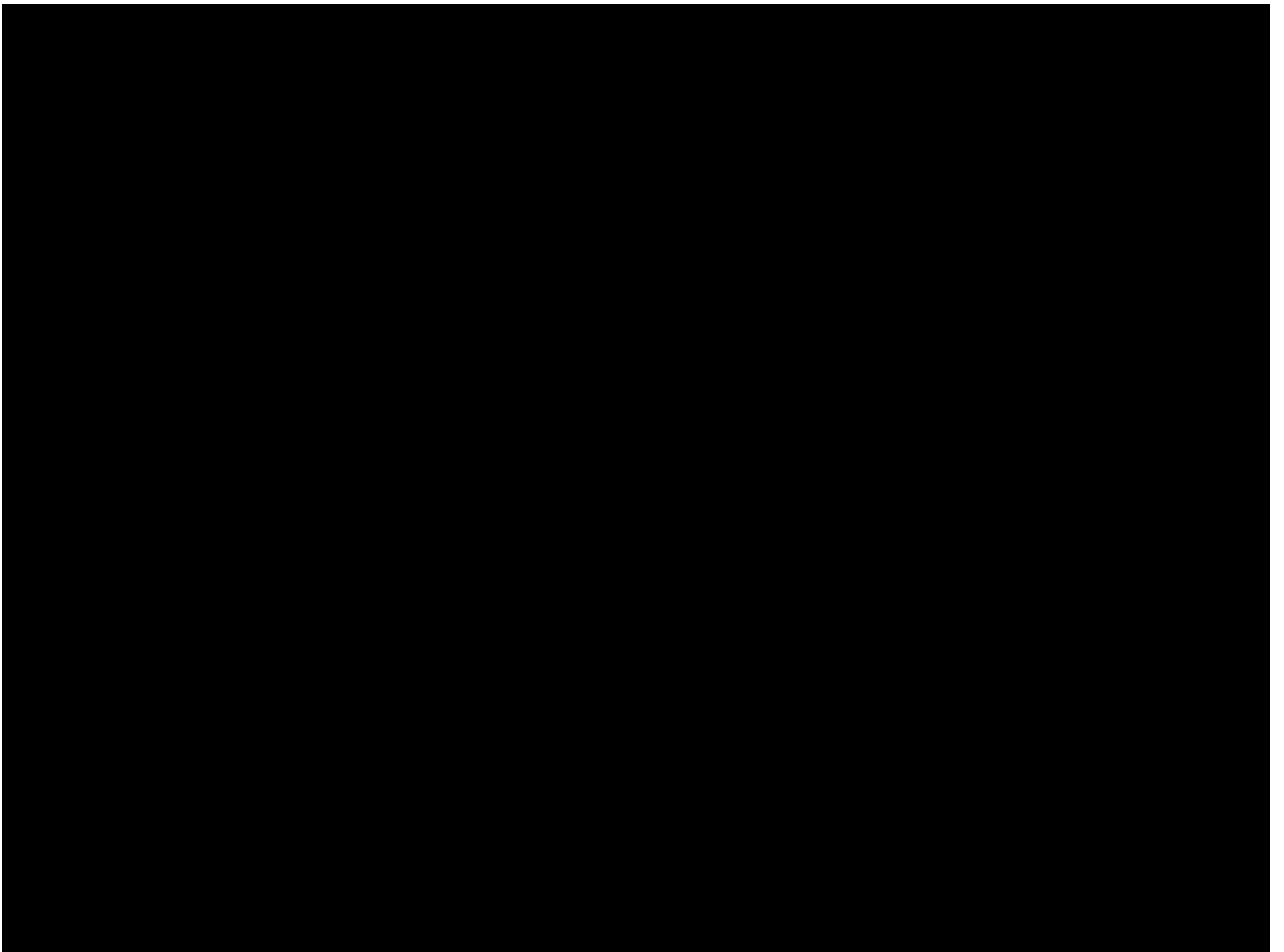
[REDACTED]

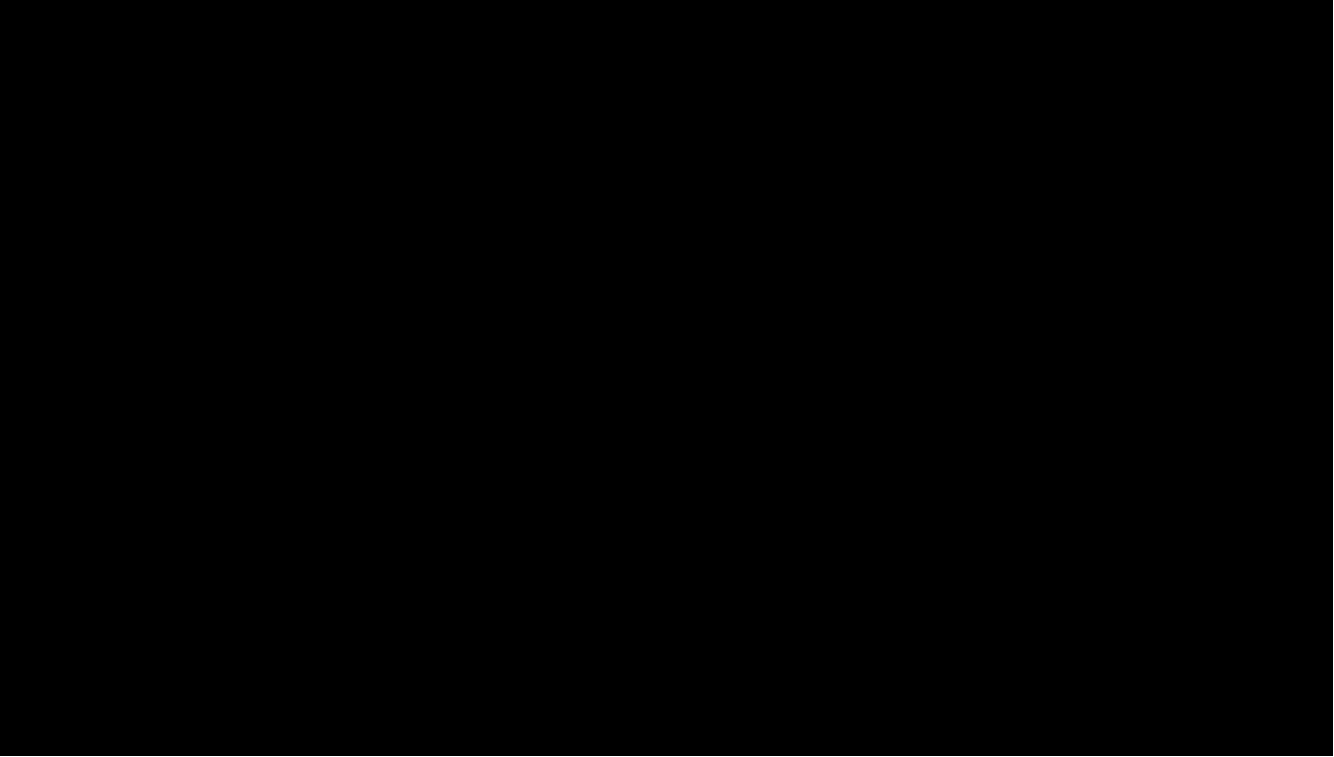
ACTING GENERAL COUNSEL

[REDACTED]

Level 15, 367 Collins Street, Melbourne VIC 3000

Logo

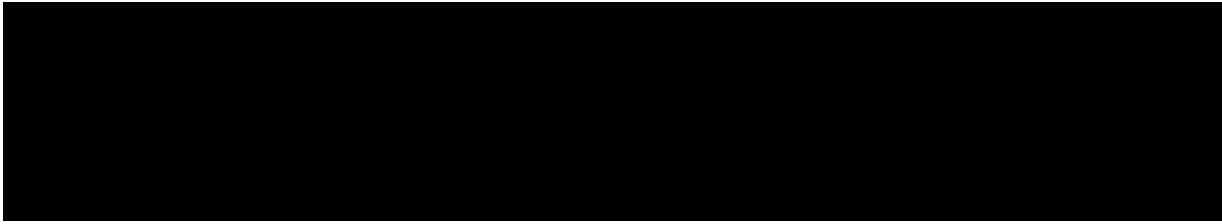




From: [REDACTED]
Sent: Monday, 28 August 2023 5:13 PM
To: [REDACTED]
Cc: IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]
[REDACTED]
Subject: RE: Correspondence from the ACMA [SEC=OFFICIAL]

Dear [REDACTED]

Thank for your time on the phone today. Sportsbet is appreciative of the opportunity to provide further submissions on this matter.



To that end, Sportsbet would like to meet with the ACMA and requests a meeting for this purpose prior to making any further submission, at a time that might be convenient for the ACMA.

If it assists, we can make ourselves available at any time after 12:30pm on Wednesday or Thursday this week. We would also be happy to share a proposed draft agenda prior to the meeting together with a list of Sportsbet attendees (and roles).

We look forward to hearing from you.

Thanks and kind regards,

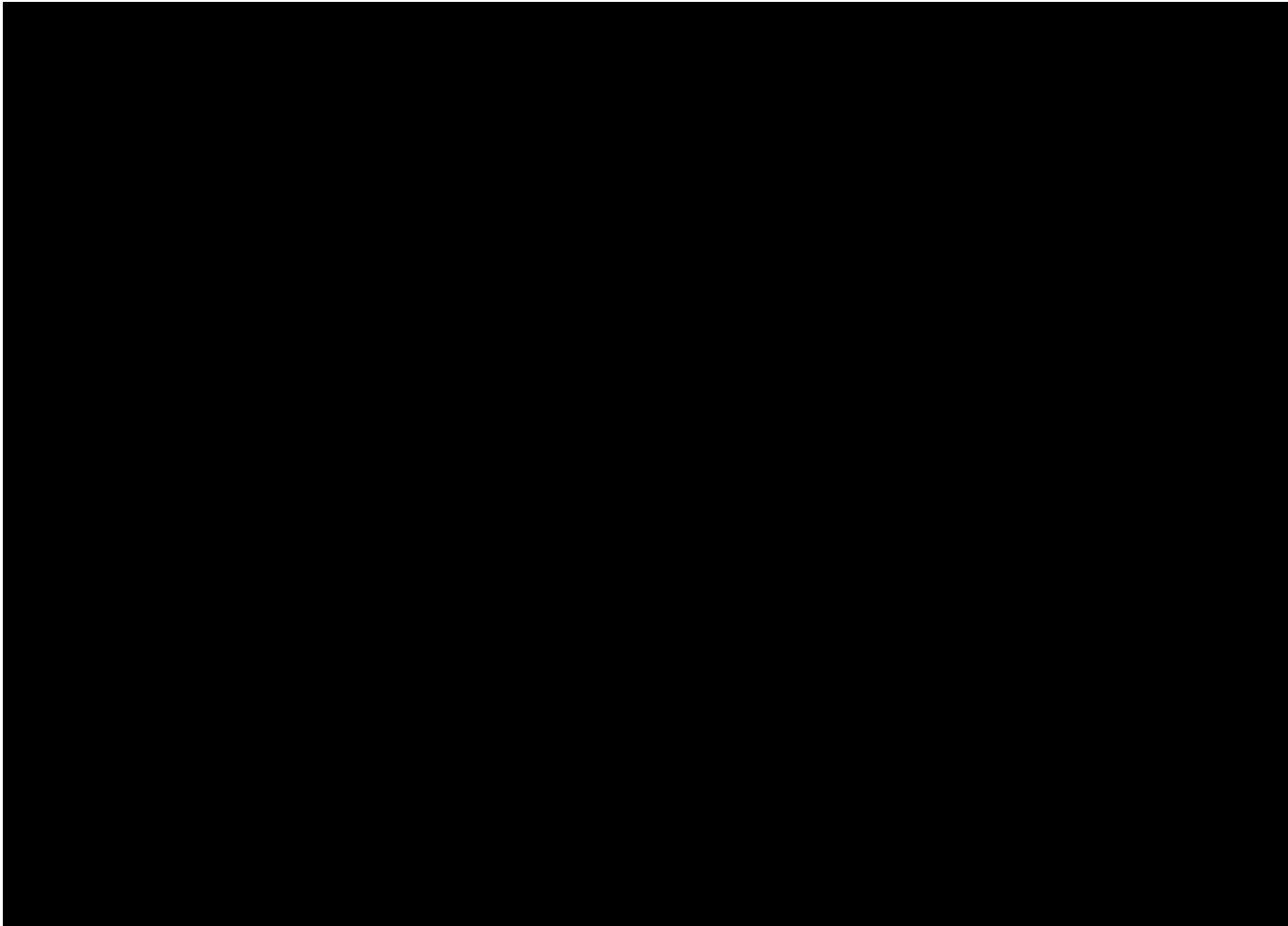
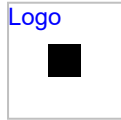


ACTING GENERAL COUNSEL



Level 15, 367 Collins Street, Melbourne VIC 3000

Logo



NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the

intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient. This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient. This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient. This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email and any attachments are confidential and must not be disclosed to any person other than the intended recipient.