

13 December 2021

By email: [REDACTED]

[REDACTED]
Australian Communications and Media Authority
Level 5, Bay Centre
65 Pirrama Road
PYRMONT NSW 2000

Dear [REDACTED]

Sportsbet's response to ACMA's request for information on use of Fast Codes for in-play betting.

Thank you for your letter of 29 November 2021.

Sportsbet appreciates the opportunity to provide ACMA with information about its live telephone betting service. Sportsbet takes this opportunity to reaffirm its commitment to compliance with its obligations under the *Interactive Gambling Act*.

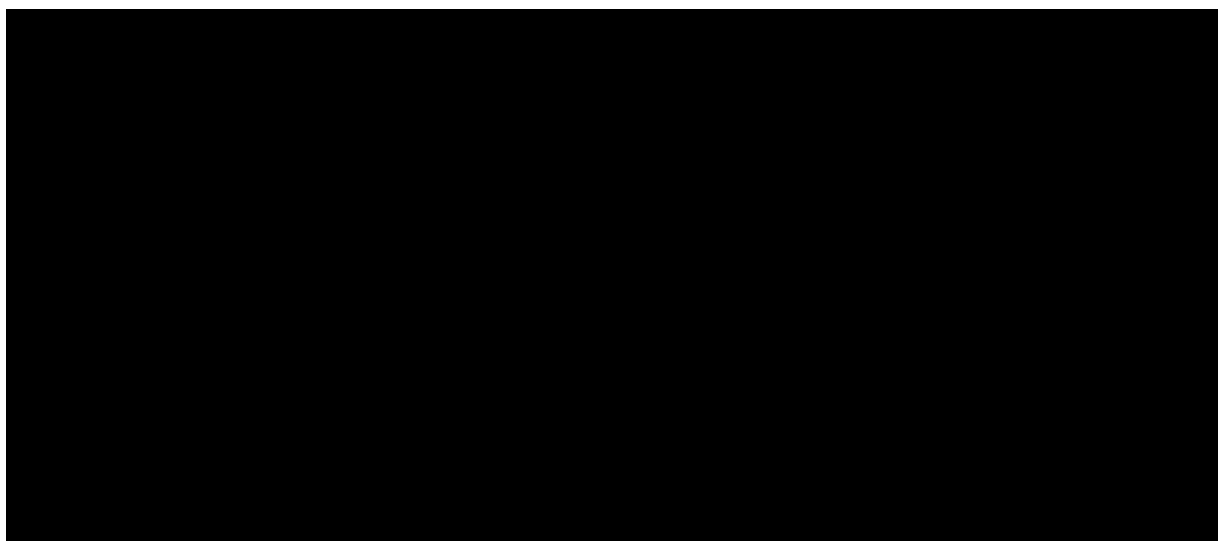
The use of short-form codes in the wagering industry

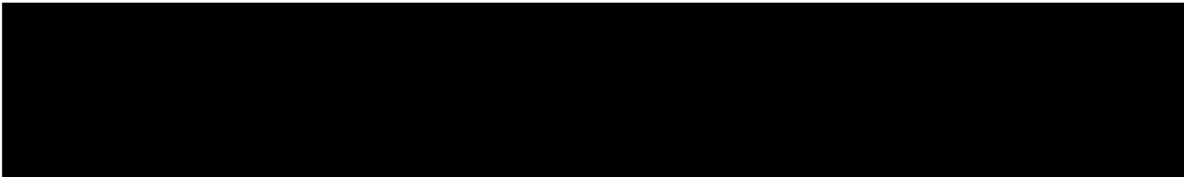
As Sportsbet understands it, the vast majority of licensed wagering operators in Australia use codes - whether numerical, alphabetical, or a combination of both – as signifiers of a particular event and/or contingency within that event. This has been the case for a number of years.

This practice was expressly acknowledged and accepted in the Explanatory Memorandum for the *Interactive Gambling Amendment Bill 2016* (the Bill that introduced section 8AA). The Explanatory Memorandum makes clear that a service may constitute a telephone betting service irrespective of the use of such codes or shorthand as convenient identifiers.

Sportsbet's live betting service

Sportsbet's live telephone betting service operates in the following way:






The Fast Codes are displayed through Sportsbet's website / app, and are communicated to Sportsbet by the customer only by way of spoken conversation during the voice call.

Like several other wagering operators, Sportsbet has been operating this kind of system since 2017.

Compliance with the Act

As noted above, a Fast Code is a signifier used to identify the event and contingency a customer wishes to wager on. The Fast Code matches a particular selection, and all customers viewing that selection will be provided with this code.

It is only after a voice call is initiated that Sportsbet (through a call agent) receives details of:

- 1.
 - 2.
 - 3.
- 

The above information is provided to Sportsbet by the customer solely by way of the voice call. Once those details are repeated back to the customer, the customer is asked to provide an express confirmation of the accuracy of those details. Again, both of these things happen through the medium of the voice call.

Having regard to these matters, Sportsbet's live betting service is entirely consistent with the requirements of the Act, as:

1. all dealings between Sportsbet and the customer occur wholly by way of spoken telephone conversation; and
2. all elements of the bet (including event, selection and stake) are communicated and confirmed solely by way of a spoken telephone conversation.

We trust this information sufficiently addresses ACMA's queries. Should ACMA require any further detail, or wish to discuss any of the above matters, please don't hesitate to contact us.

Yours sincerely,



Sportsbet



Sportsbet