

Monday, February 5, 2018

Dear Ms Burd,

Please allow me to briefly introduce bet365. We are a UK based group of companies and a very large online betting operator with 2016/17 GGR of c. \$3 billion. We are licensed and regulated in many countries, including the UK since 2007.

We only wish to make one comment on the proposed draft online regulations and it relates to the required location (if any) of the “associated equipment” and the “interactive gaming system”.

Whilst we fully understand the requirement to “control” any interactive gaming system in PA, the technical IT architecture for these types of systems is really quite complex and there are typically multiple servers doing multiple functions and integrating to many external gateways.

In New Jersey, we understand that the legal requirement is that the “outcome” of a casino type game has to happen within the State (so the RNG etc has to be there) but with Sportsbetging of course the outcome of the bet is determined on the football field or basketball court.

It is far too complex a subject to fully cover in this brief email but I would encourage PA or discuss matters with NJ (Mr Robert Moncrief) who have good experience with online gaming and who have been investigating in which ways online betting might be different to gaming.

As and when PA get to more detailed regulation regarding online betting or gaming bet365 would be very pleased to assist if there is opportunity as we have substantial international experience in this matter.

I hope to be able to discuss the topic with Ms Susan Hensel at the regulatory conference in London this week but noticed that the deadline for formal consultations was today, hence this email.

Kind regards,

Jon

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