[redacted] s22 - irrelevant information

From: Steve [redacted] s47F - personal privacy

Sent: Sunday, 20 March 2011 5:45 PM

To: [redacted] s22 - irrelevant information

Subject: PHASE II FINAL DRAFT [SEC = IN-CONFIDENCE]

Importance: High

Attachments: TTG Invoice FaHCSIA-10.doc; DRAFT - Phase II Report v0.5 (pwd).zip

Hi,

Subject to a need for clarification or edits, I consider this report to be a final draft and as such, have largely advanced the schedule by 1 week. There is a lot of groundwork at a high level, so I expect clarification will be sought during the course of the week.

NOTE:

a) The executive summary has been completely re-written and condensed (under 2 pages with footnotes), given that I have a better understanding of your primary concerns.

b) I reason that what should be 'agreed to by the parties' is the standard. On that basis time must be allowed for the specification and design based on agreed standards. Therefore, standards must reasonably be agreed to before the end of 2011 for partial and 2013 for full pre-commitment, respectively (Appendix A of the report). s47G - business

[redacted]

Can you please advise at your earliest convenience when you might wish me to attend Canberra to discuss with your staff (part of the Phase II scope) or Minister's advisors (specific meeting in scope) [redacted]

[redacted] s47F - persor privacy

[redacted] s47F - personal privacy

Invoice for the draft is attached. Invoice for the final will follow on the 25th if not sooner.

Kind Regards,

Steve J. Toneguzzo

The Toneguzzo Group

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Please consider the environment before printing this email

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The Toneguzzo Solutions Engineering Group

ABN: 37 094 383 141

TAX INVOICE

Date: 18 March, 2011

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Problem Gambling Taskforce
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Invoice: FaHCSIA-10
FaHCSIA Contract #: 45389828

N.B. All original receipts provided with printed copy.

DESCRIPTION	AMOUNT
Toneguzzo Consulting per contract #45389512. Phase II Draft	$9090.91
GST on Toneguzzo Consulting @10%	$909.09
TOTAL CONSULTING FEES INCLUDING GST	**$10,000.00**
TOTAL EXPENSES AT COST (incl GST)	**$0.00**
TOTAL OF INVOICE	**$10,000.00**

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Account Number:
Swift Code:
Bank:

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Terms: 30 Days, Direct deposit and e-mail notification preferred.

The Toneguzzo Solutions Engineering Group

ABN: 37 094 383 141

DRAFT REPORT

Advice to the Commonwealth on the technical issues associated with the implementation of the Government's gambling reforms.

PHASE II: ALTERNATIVE SOLUTIONS

Prepared For:	Problem Gambling Taskforce Department of Families Community Services and Indigenous Affairs [redacted]
Prepared By:	Stephen John Toneguzzo
Contract #:	45389828

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DISCLAIMER

A significantly complex area has been broadly analysed in a relatively short period of time. All reasonable care has been taken in the preparation and analysis of information contained in this report. However, the information, views and referenced material in this report are provided solely on the basis that the reader will be responsible for making their own assessment of the information provided.

This report is not necessarily representative of the views of the Government or the Commonwealth of Australia.

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APPENDIX I: KEY CRITERIA CHECKLIST I

EXECUTIVE SUMMARY

This report makes a reasoned argument of the definition and implications of clauses 7.5(a) and 7.5(b) of The Agreement[1] between The Hon Julia Gillard (Prime Minister) and Mr Andrew Wilkie (elect MP Denison) entered into on 2 September, 2010 (The Agreement). In doing so, the infrastructure objectives (collectively the *vision*) is defined[2], various transition paths are explored and specific client questions[3] are addressed.

No jurisdiction currently has the technical capability to implement all reforms without time and money being directed towards five primary categories:

a) Regulatory infrastructure.

b) Branding, marketing and consumer education.

c) Research, development and production.

d) Technical infrastructure changes and roll-out.

e) Establishment of business operations of the reforms.

The basic functions required for pre-commitment or pop-up messages[4] at the EGM are:

a) Specific EGM metering information in real-time.

b) A player interface (screen, buttons, card reader, speaker).

c) An ability to stop EGM game play.

d) A player identity card.

These basic functions may be collectively realised through a combination of new (player identity and gambling reforms systems) and existing (monitoring[5] systems, subsidiary equipment[6], EGM) infrastructure.

[redacted] s47G - business

[1] See Ibid. 1.2

[2] Ibid. 3

[3] Outlined in Ibid. 1.3.2

[4] Such as dynamic warning or cost-of-play.

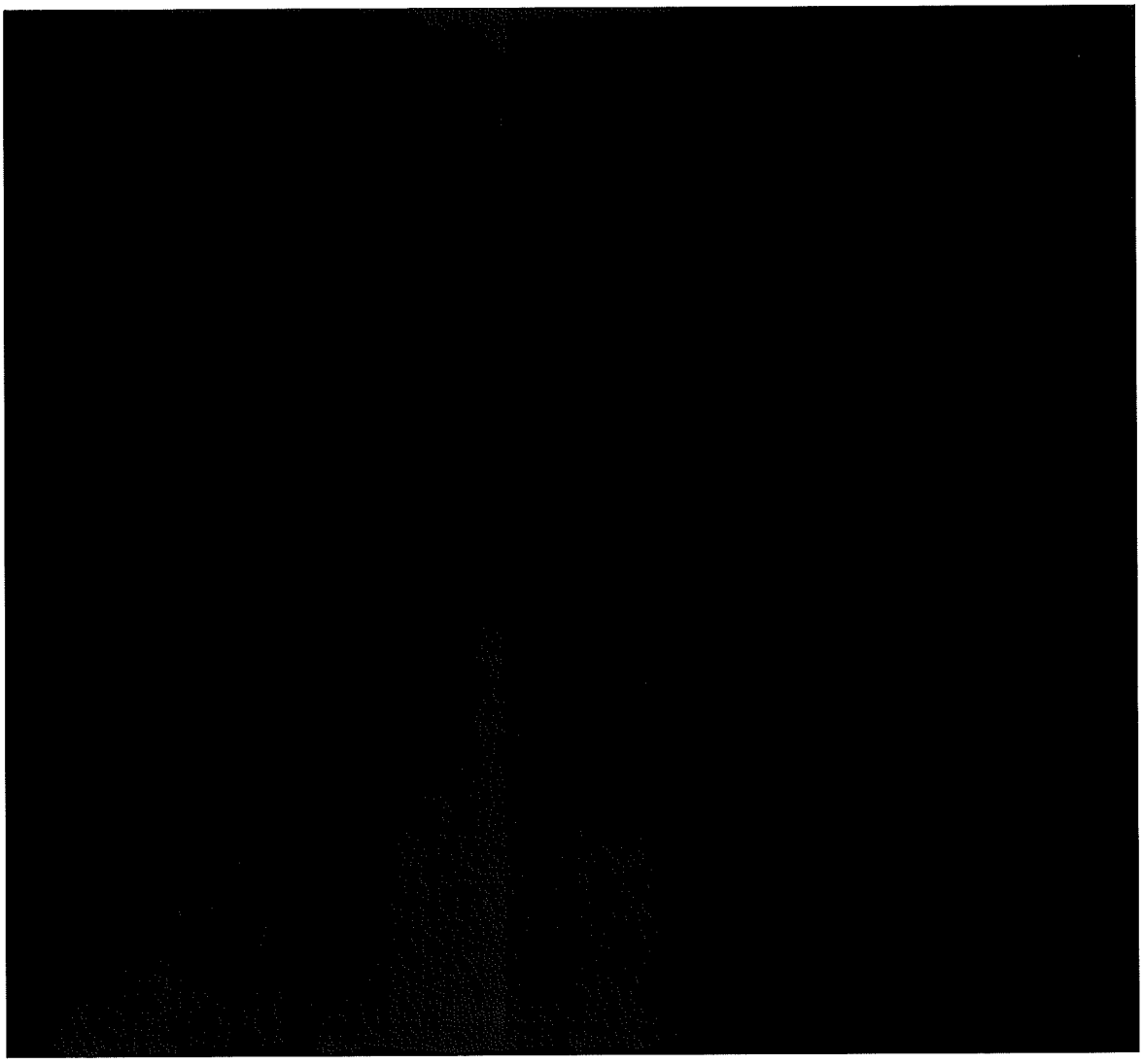
[6] Monitoring is a regulatory requirement for taxation purposes and ensures the integrity of EGM gambling.

[6] Subsidiary equipment in this context has a card reader and is most likely a loyalty marketing system.

System-based may be considered as 'centralised decision making' and EGM-based as 'de-centralised'.

In addition to the implementation of the gambling reforms, the productivity commission identified a need for policy flexibility. Such flexibility is best achieved by changes being pushed out to EGMs over a network from a single point of control, using a standard EGM communications protocol.

A need for a standard EGM communications protocol is the key difference between implementation of full pre-commitment in systems and in EGMs (with supporting systems).



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———ooo000ooo———

[7] Ibid. 3.2

1 INTRODUCTION

1.1 PURPOSE

This report addresses specific brief questions and presents alternative staged models to inform the development of an optimum plan for transitioning to a best practice full pre-commitment scheme that is uniform across all States and territories and machines; EGM dynamic warning and cost of play displays.

1.2 BACKGROUND

On 2 September, 2010, The Hon Julia Gillard (Prime Minister) and Mr Andrew Wilkie (elect MP Denison) entered into 'The Agreement', where amongst other issues, the Government committed to the following measures related to poker machines, recorded at clause 7.5:

"The Government commits to...the following additional measures[8]:

a) *Implementing a best practice full pre-commitment scheme – that is uniform across all states and territories and machines – consistent with recommendations and findings of the Productivity Commission. Implementation of pre-commitment arrangements will commence in 2012, with the full pre–commitment scheme commencing in 2014, working with states and territories to achieve this outcome. The full pre-commitment scheme will include the use of technology that is expected to have the best chance of reducing problem gambling.*

b) *Supporting the Productivity Commission recommendations in relation to poker machine dynamic warning displays and cost-of-play displays."*

1.3 PROJECT BRIEF

1.3.1 Phase I

The background work of Phase I is presented in a report which provides:

a) An assessment of existing infrastructure[9] in each state and territory which supports EGM gambling and its capacity to deliver a uniform best practice

[8] Emphasis Added.

[9] Infrastructure refers to, but is not limited to, gaming machines standards, regulatory agencies, patents, central monitoring systems, protocols and EGMs

full pre-commitment scheme and dynamic warning and cost-of-play displays[10].

b) An analysis of technological challenges and possible solutions in implementing a uniform best practice, full pre-commitment system, dynamic warning and cost-of-play displays.

1.3.2 Phase II

This phase of the project is to devise alternative staged models for transitioning to a best practice full pre-commitment scheme that is uniform across all states and territories and EGMs; and EGM dynamic warning and cost-of-play displays.

The models and options include indicative costs of developing, upgrading, retrofitting or replacing existing infrastructure (including EGMs) and consider the following targeted questions posed by the Commonwealth:

a) timeframes as set out in The Agreement[11],

b) how to build upon existing infrastructure and technology[12],

c) how to meet the commitments of reform in the most cost effective and efficient way[13],

d) the possibility of different levels of support for gambling reforms across jurisdictions (States are in or out)[14],

e) the potential differences in implementation based on either maintaining the existing state/territory responsibility or the Commonwealth assuming responsibility for regulation of gambling[15],

f) the extent to which the technological issues associated with a pre-commitment scheme and dynamic warning and cost-of-play displays are interlinked[16],

g) monitoring and compliance requirements including a detailed assessment on how privacy and data security issues could be addressed[17],

h) the extent to which future adjustments to policy parameters could be flexibly accommodated[18],

---

[10] The report is based on an understanding of the definition of these terms as in Section 3.

[11] Ibid. 3.23.2

[12] Part III, Ibid 4

[13] Part III, Ibid 4

[14] Part III, Ibid 4

[15] Part III, Ibid 4

[16] Ibid. 5.3

[17] Ibid. 6

i) appropriate high level business rules that could be generic across a range of products, but not specific to or reliant on any particular software product or provider/manufacturer[19],

j) details of how users would interact with the system, for example; would a centralised web based point for people be required to set pre-commitment levels? If so how would this be validated (logon/password; self-administered) and how could such a system be administered[20]?

k) the extent to which the objective of uniformity can be accommodated within diverse technological approaches[21],

l) Risks and benefits associated with each option[22].

1.4 METHODOLOGY

Phase II builds upon the work of Phase I, in a stepped approach by considering the infrastructure and challenges identified, and devising possible solutions.

[redacted] s47G - business

Step 2: Overview of Transition Paths

Consider the path(s) of transition from current infrastructure to the target, at a high level and release a discussion draft.

Step 3: Elimination Round 1

If an attempted transition from the current infrastructure to the target results in a dead-end, it will be eliminated from further analysis.

Conducting a workshop with FaHCSIA will be important to determine the focus of further modeling.

[18] Ibid. 3.6

[19] Ibid. 5

[20] Ibid. Appendix D.4.1

[21] Ibid. 3.5

[22] Ibid. 4.2 and 4.3

Step 4: Model

Transition models will be devised by Stephen Toneguzzo by drawing on work performed in Phase I, feedback from FaHCSIA, Toneguzzo's formal engineering and technology management education, combined with his 20 years of international experience in all aspects of gambling technology, operation, regulation, research, publication, consultation and responsible gambling practices. A draft for release is prepared at this point.

Step 5: Elimination Round 2

If a preliminary model for a transition from the current infrastructure to the target, results in an impractical or prohibitively expensive solution, it will be eliminated from further analysis.

Consulting with FaHCSIA on the draft report will help to focus on an optimum path and identify future actions required by the Commonwealth to progress a solution.

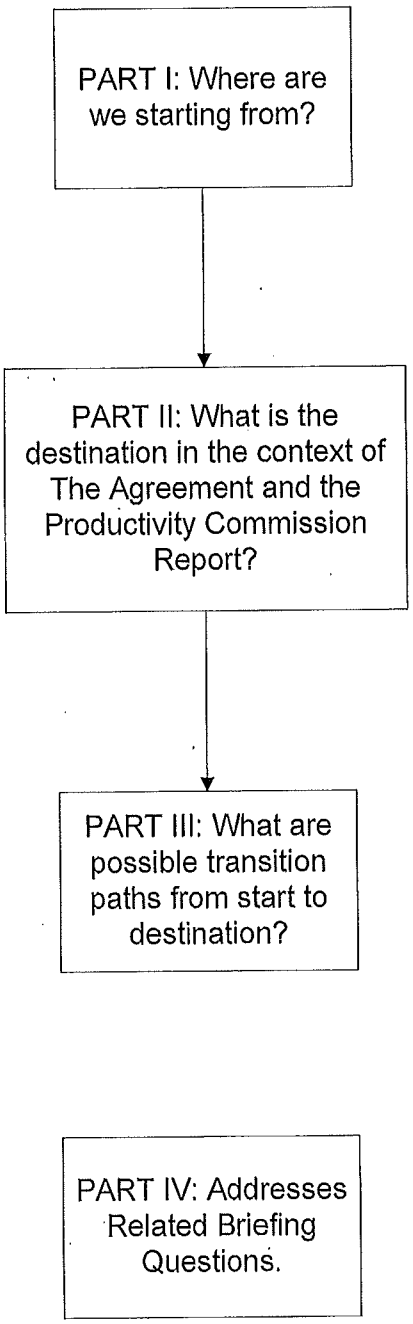
Step 6: Refine models and complete report

Refinement of remaining transition models and completion of report.

1.5 REPORT STRUCTURE

It is not possible to define a path without knowing the starting point and the destination. If the destination changes, so do the paths. To this end, and in the absence of clear direction, the destination is established through a clinical analysis of The Agreement and predicated on related assumptions.

The report is structured and flows as follows:



PART I

2 WHERE DO WE START?

Basic functions required for pre-commitment or pop-up messages[23] at the EGM:

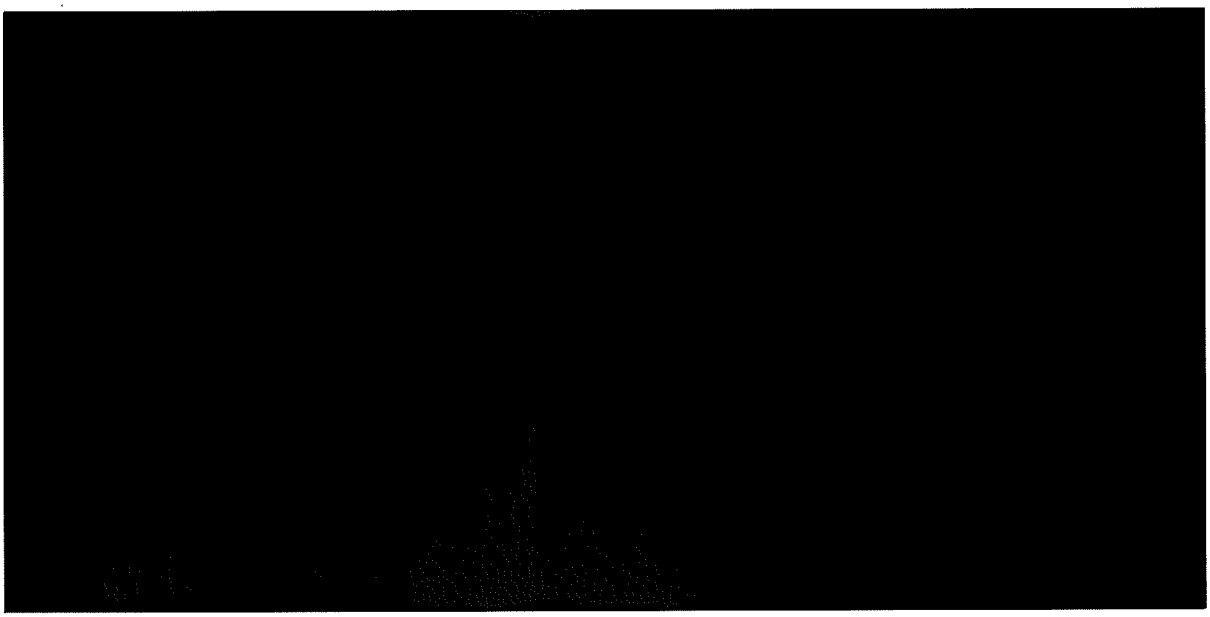
a) Specific EGM metering information in real-time.

b) A player interface (screen, buttons, card reader, speaker).

c) An ability to stop EGM game play.

d) A player identity card.

These basic functions may be collectively realised through a combination of new (player identity and gambling reforms systems) and existing (monitoring[24] systems, subsidiary equipment[25], EGM) infrastructure.



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[23] Such as dynamic warning or cost-of-play.

[24] Monitoring is a regulatory requirement for taxation purposes and ensures the integrity of EGM gambling.

[25] Subsidiary equipment in this context has a card reader and is most likely a loyalty marketing system.

2.1 TABLE: EGMs AND SYSTEMS.

STATE	[redacted]
NSW	
QLD	
VIC[26]	
SA	
ACT	
TAS	
NT	
WA	

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Notes:

a) The figures below are based on industry estimates.

b) It is important to design (and cost) a system to capacity, so State EGM caps are used in preparing all estimates.

c) Total National EGM capacity = 204,698

[redacted]

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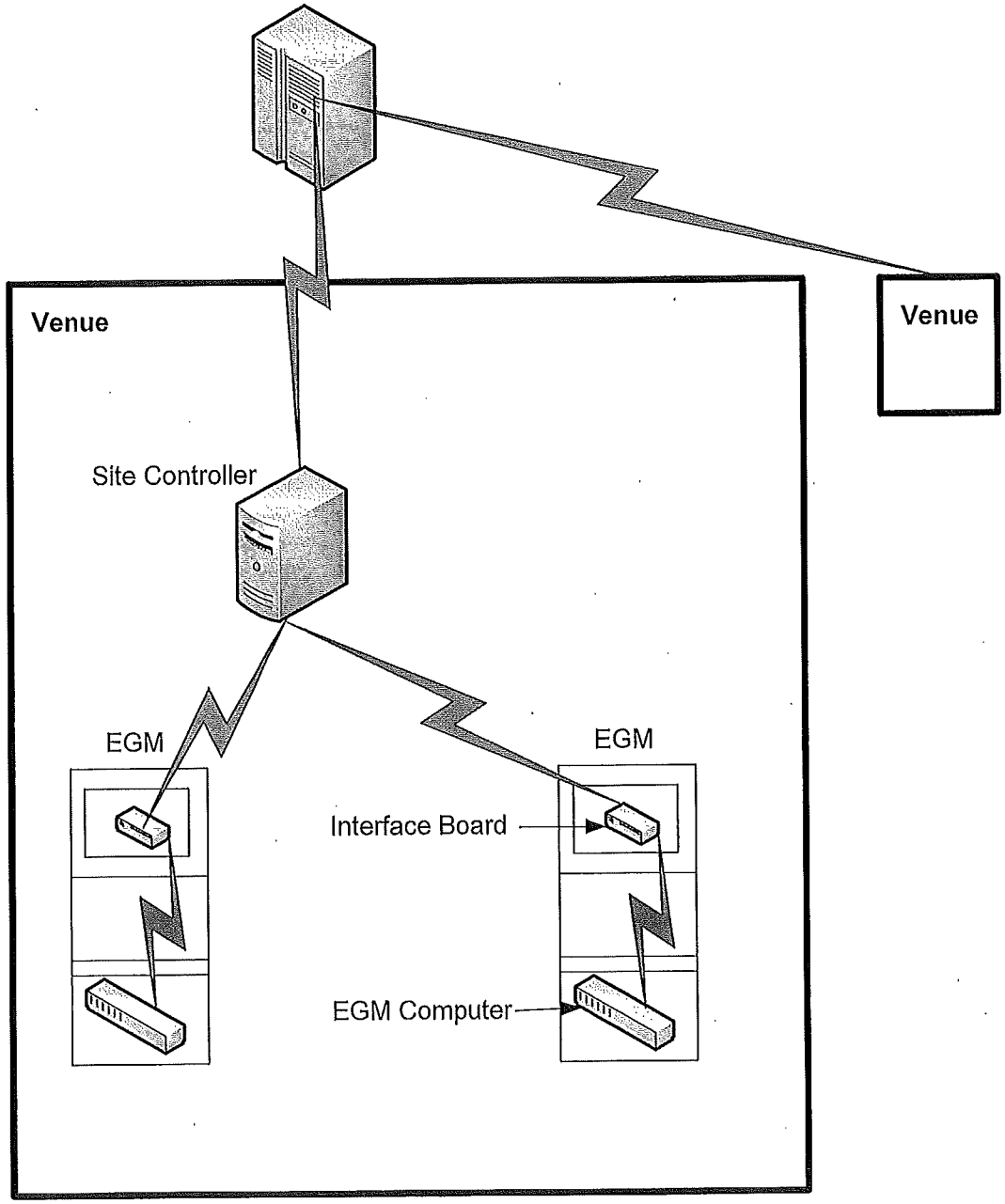
[26] Monitoring licenses expire 2012.

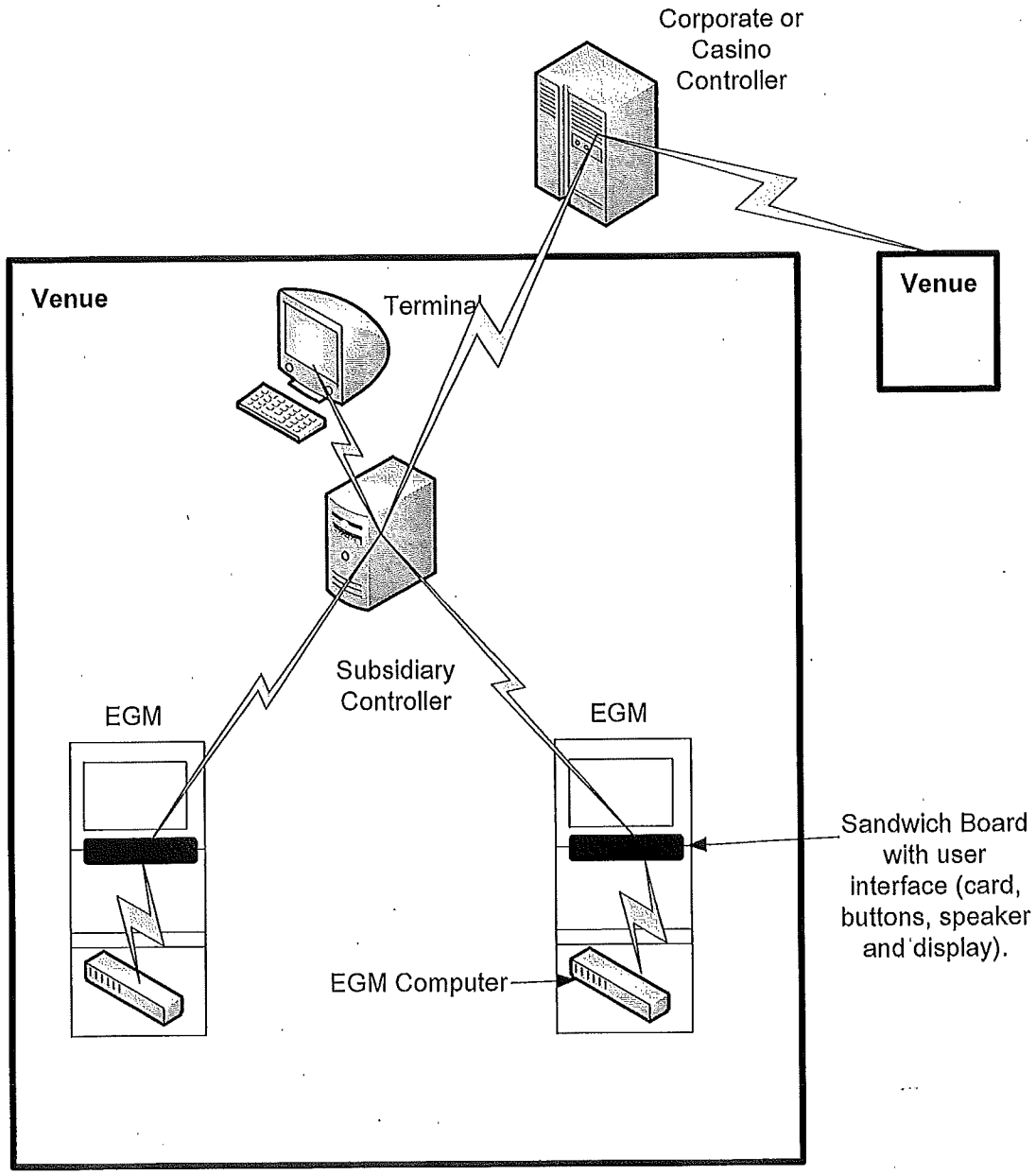
2.2 FIGURE: CLUB AND PUB MONITORING

The emphasis is on tax collection and integrity of gaming.



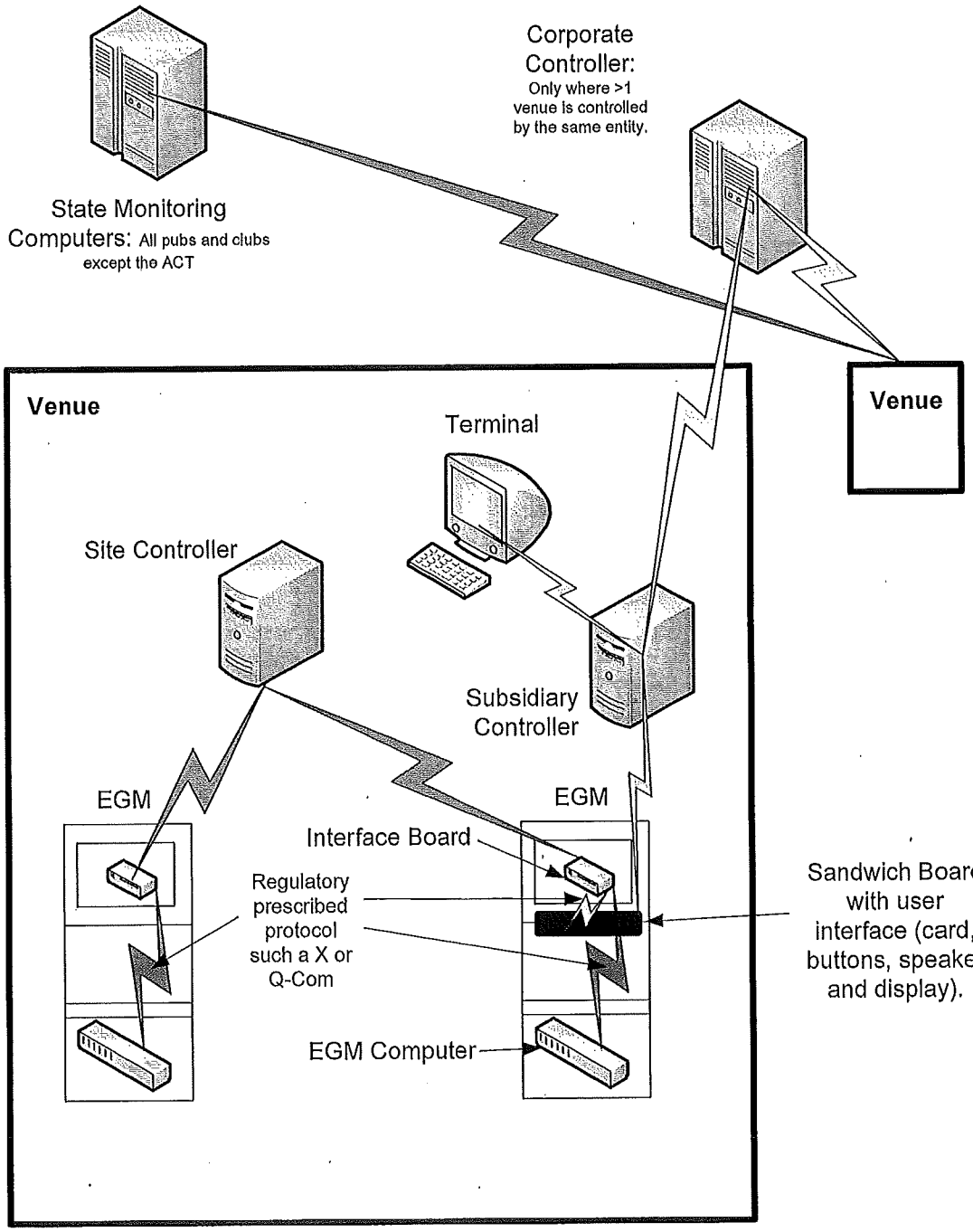
2.3 FIGURE: CASINO AND ACT PUB AND CLUB SUBSIDIARY SYSTEMS

The emphasis is on business management and marketing.



2.4 FIGURE: MONITORING AND SUBSIDIARY SYSTEM

This is a combination of regulatory and business functions.



PART II

3 WHERE DO WE END?

3.1 INTRODUCTION

The government has committed to implementing reforms related to poker machines[27].

A 'full pre-commitment scheme', 'dynamic warning and 'cost-of-play display' are discussed in the Productivity Commission's Report[28] into gambling, however, in order to design a technical solution, they need to be accurately and extensively defined.

To provide for clarity and certainty in the marketplace, a clear definition (vision) of where the industry is heading is required.

This Part II of the Report aims to define the vision (or target). If the vision is the *destination*, then the transition paths are the *journey*.

With a clear definition of the vision, one may explore different ways to achieve it. The '*Transition Paths*' form Part III of the Report.

To achieve the goal of defining the vision, this section explores:

(a) Time frame,

(b) Each of the major terms in The Agreement, and the

(c) Additional commonwealth requirement of flexibility in policy implementation.

3.2 TIME FRAME ASSUMPTIONS

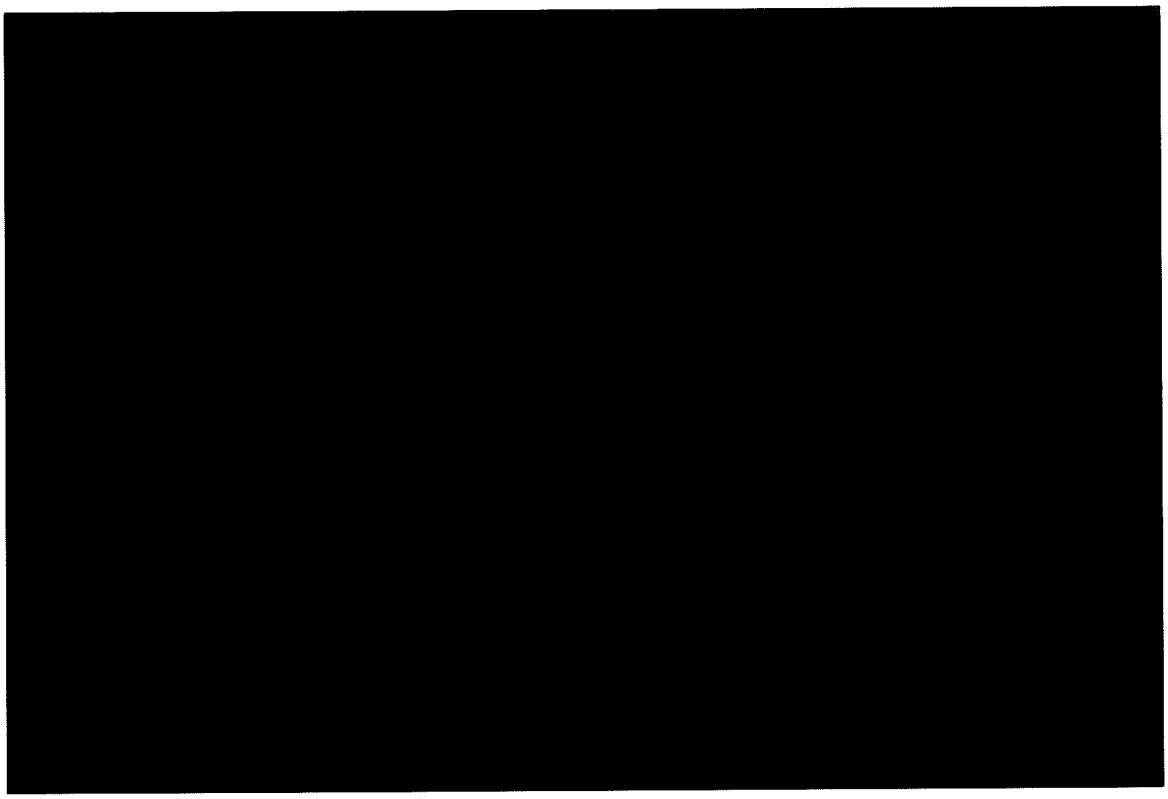
This section addresses Brief question of timeframes[29] as set out in The Agreement.

[redacted] s47G - business

[27] Ibid 1.2

[28] http://www.pc.gov.au/projects/inquiry/gambling-2009/report

[29] Refer to Appendix A for a detailed analysis of the basis of the following assumptions.



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3.3 DEFINITIONS AND ASSUMPTIONS

3.3.1 Dynamic Warning

Dynamic warnings are messages that change in content or format and are periodically displayed, given certain pre-requisites, while players are gambling. The content of a dynamic warning may be related to player activity.

3.3.1.1 Design Assumptions

When, and how a warning is determined (perhaps by complex algorithms formulated on expert system, heuristics[32], or otherwise), and what is displayed are not matters considered in this report, as they are more in the domain of human behavioral science.

Therefore, functionality must be realised in the technical infrastructure of a solution to provide for flexibility in the algorithms and messages into the future.

---

[30] Ibid. 5.3

[31] Productivity Commission Report, Volume 1, table 1, page 41.

[32] Trial and error

3.3.2 Cost-of-Play

Cost of play displays are messages designed to inform players about the cost of playing through disclosing the expected hourly expenditure and information on the 'return to player'.

3.3.2.1 Design Assumptions

s47G - business [redacted] s47G - business

s47G - business [redacted] When, and how cost-of-play is determined, and what is displayed are not matters for this report.

Functionality must therefore be realised in the technical infrastructure of a solution to provide for flexibility in the algorithms and messages into the future.

3.3.3 Full Pre-Commitment System

Pre-commitment is a process that provides for player-determined spending and time limits, reminders and transaction records. EGM play is either not permitted or changed to 'safe play' mode when a limit is reached.

3.3.3.1 Design Assumptions

Refer to Appendix B for a detailed analysis of the basis of the following design assumptions:

A Pre-commitment system:

a) Must track spending limits.

b) Requires on-line and real-time communications to a point in the system performing analysis, ID issue and validation. That 'point in the system' could be at the EGM, venue, jurisdiction, national or other variations of geographic spacing.

c) There must be a database to baseline and mine data for future analysis.

d) Player limits must be independent of EGM and venue (that is, not Session Based).

e) All EGMs must have an ability to communicate with a system or device that determines validity of an identity (ID).

f) All EGMs must have an ability to communicate with a system or device that enables an assessment of current play against limit values.

[redacted] s47G - business

[redacted]

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3.4 BEST-PRACTICE

'Best Practice' is defined and analysed in Appendix C. The application of best practice to the reforms may be broken down into three areas:

a) Processes,

b) Design, and

c) Regulation.

[redacted]

3.5 UNIFORM

This section addresses the Phase II Brief question of the extent to which the objective of uniformity can be accommodated within diverse technological approaches.

[redacted]

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[redacted]

3.6 POLICY FLEXIBILITY

This section addressed the Phase II Brief questions of the extent to which future adjustments to policy parameters could be flexibly accommodated.

Detail is located in Appendix E.

[redacted]

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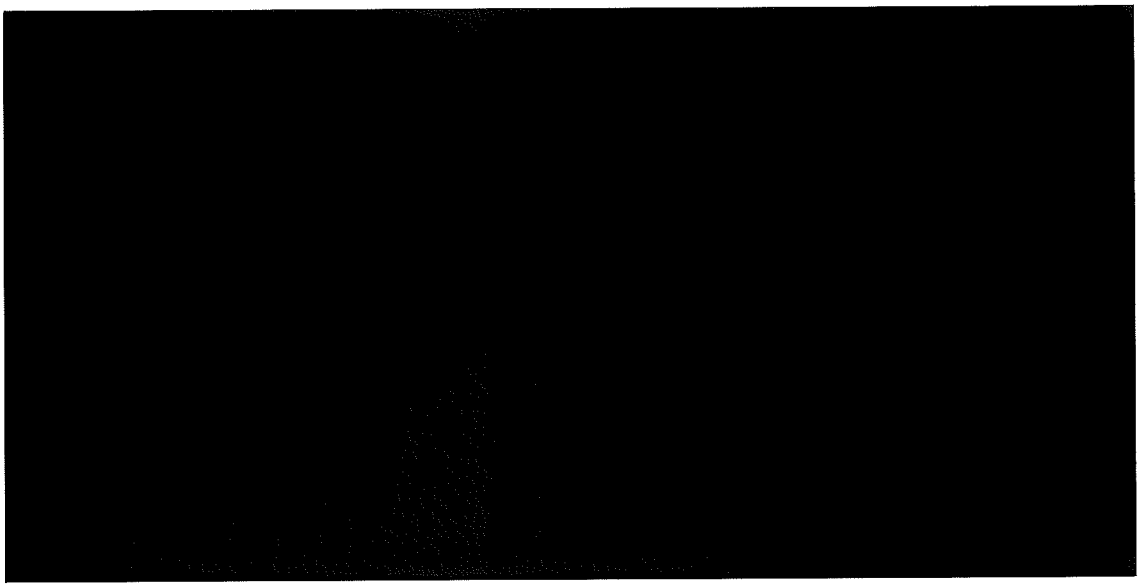
[34] Ibid. Section 3.4

[35] Ibid. Section 33.5



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3.7 KEY CRITERIA CHECKLIST

This checklist at Appendix I, is compiled from key requirements of a best practice and uniform solution.

PART III

4.2 TABLE: EGM BASED SOLUTION

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OVERVIEW	The gambler interacts with the EGM. Decisions are made by the EGM. Before each session the player is given the option to set limits for that session using the EGM button panel to navigate. Once limits are reached, play continues. All display is on the EGM screen.	The gambler interacts with the EGM. Decisions are made by the EGM. EGM has a smart card reader. Limits are set at the EGM and stored on the card or at a kiosk or venue terminal. No registration is required. Anonymous use. All display is on the EGM screen.	The gambler interfaces with the bolt-on. Decisions are made at the EGM (the bolt-on), but not by the EGM. A smart card reader is attached to the EGM. Limits are set at the bolt-on and stored on the card or are set at a kiosk or venue terminal. No registration is required. Anonymous use. Display is on the bolt-on.
REACH	EGM – Game session only	EGM, Venue, Region, Jurisdiction, Nation	EGM, Venue, Region, Jurisdiction, Nation
COMPULSION	Partial	Partial	Partial

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4.4.2 Transitional Levels of Control

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LEVEL	# OF DIFFERENT ID AND GAMBLING REFORM SYSTEMS NEEDED	COMPLEXITY	UNIFORM?
VENUE Section 4.4.3.1	Up to 5,700 venues (there may be levels of corporate control of multiple venues).	[redacted]	No
JURISDICTION Section 4.4.3.2	Up to 22: 8 State Monitoring Systems, 13 Casinos 1 Cruise Ship		No
NATIONAL Section 4.4.3.3	1		Yes

4.4.3 Combinations of System Control

At each level of control there are numerous ways in which the functions of ID and gambling reforms can be undertaken with other systems, further adding to complexity.

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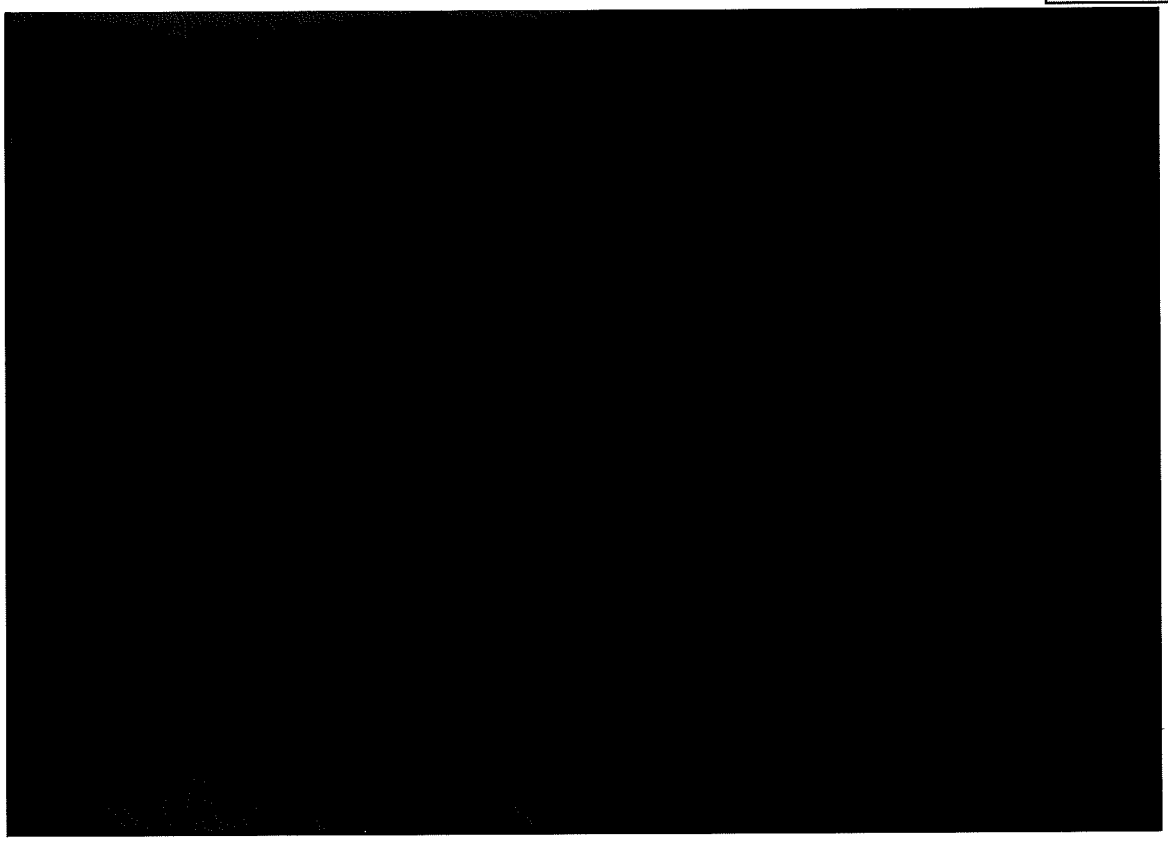
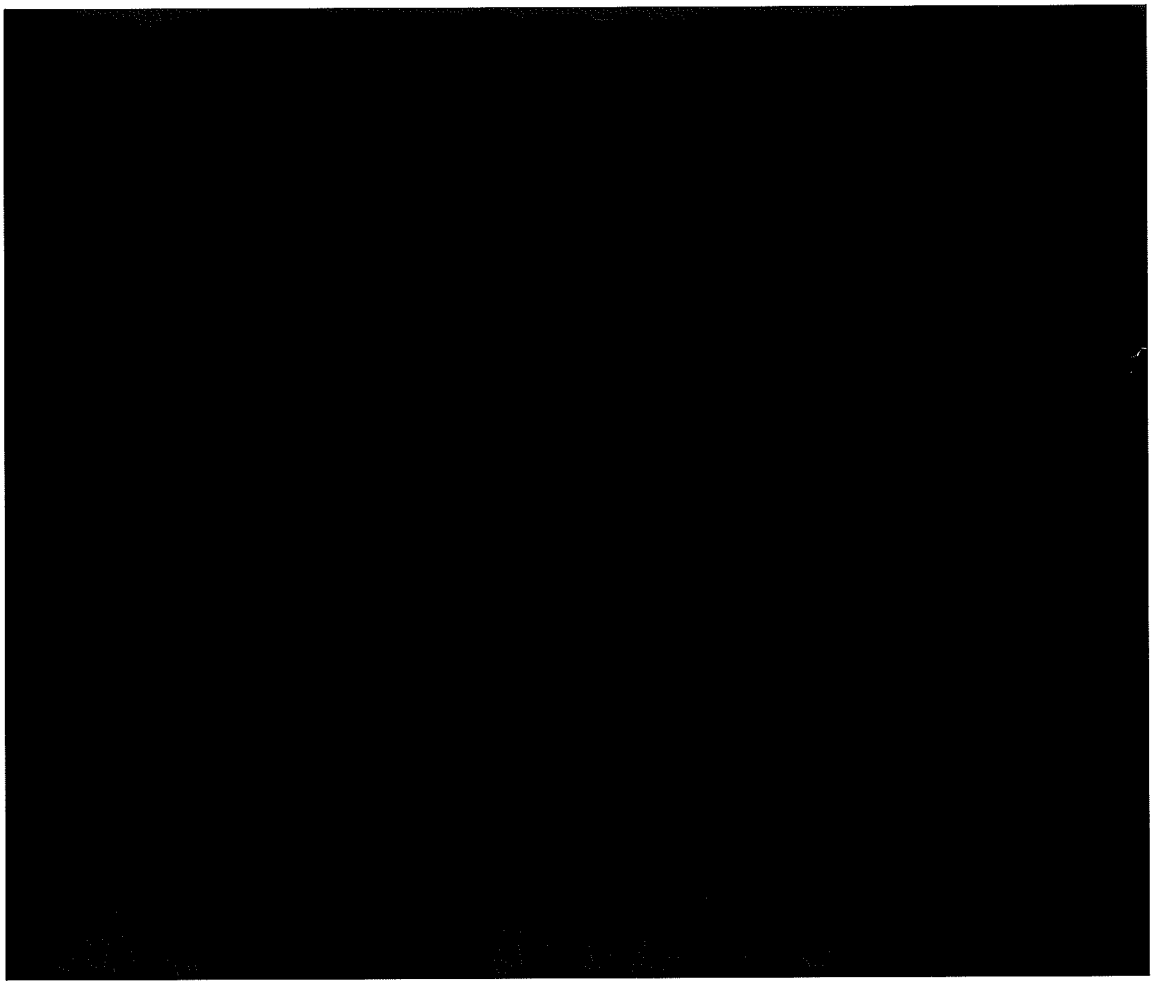


4.5 TRANSITION FLOW-CHARTS

The flow-charts below outline the major steps in transitioning from the current situation to the target.



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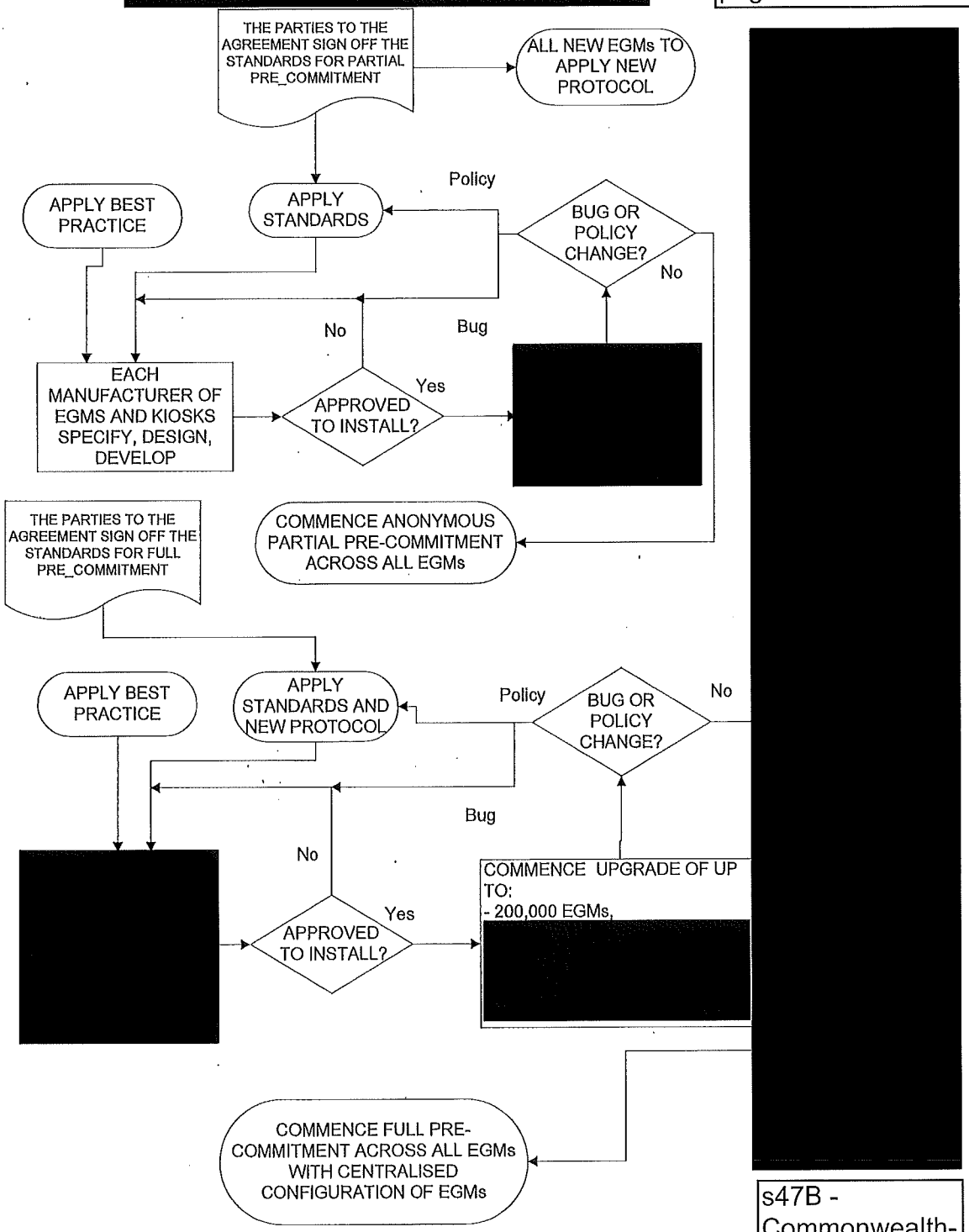
4.5.1 [redacted]



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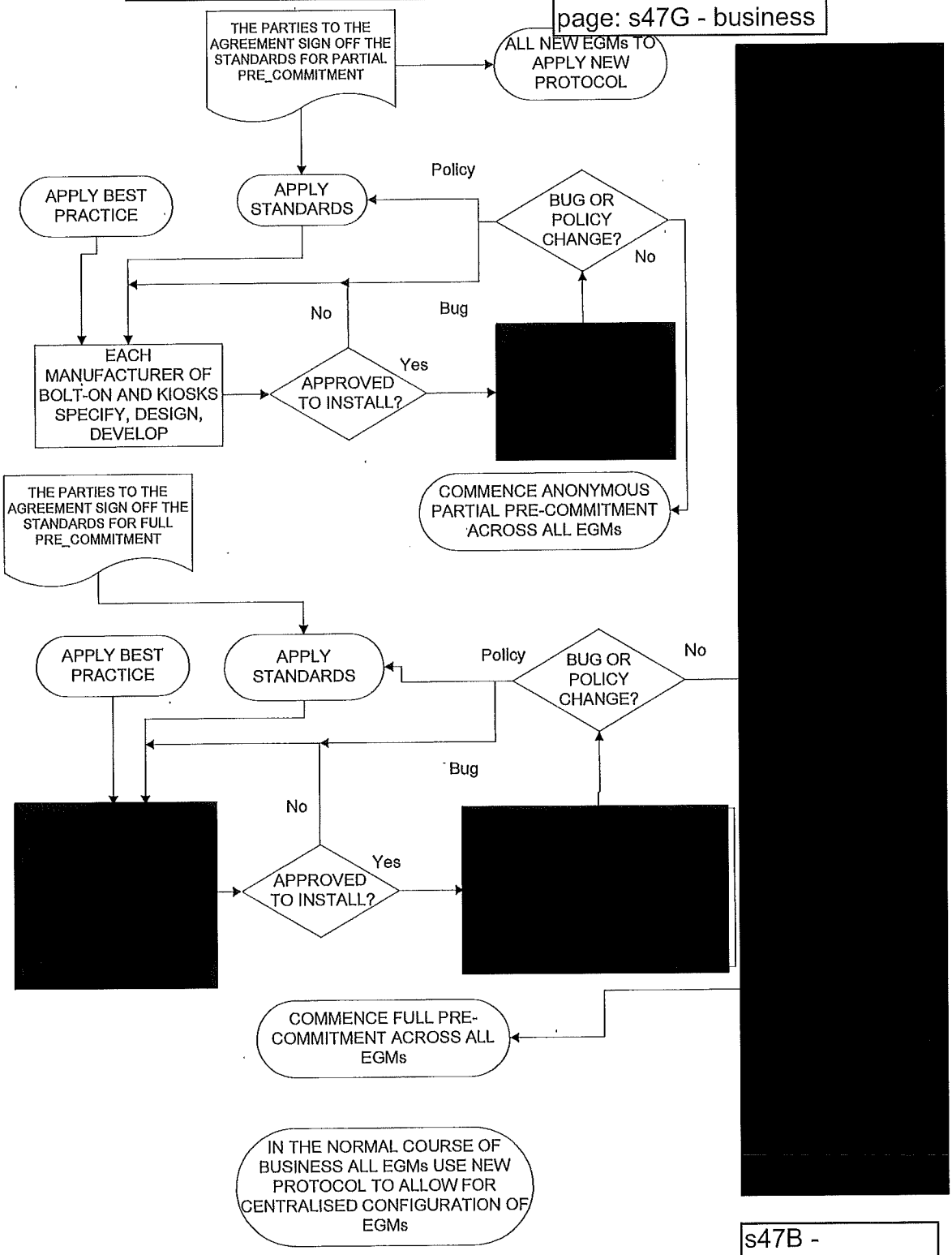
4.5.2 [redacted]



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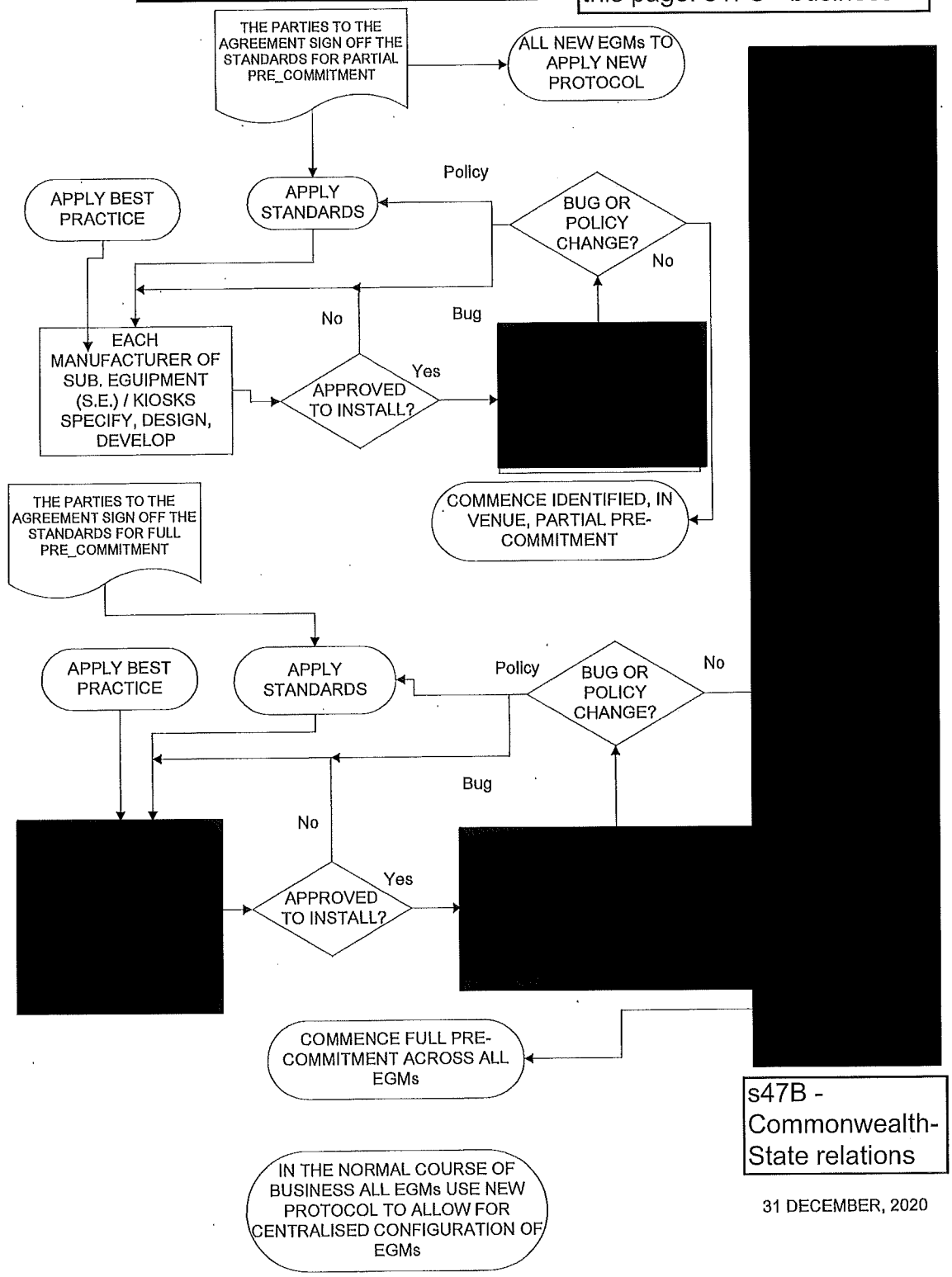
4.5.3 [redacted]



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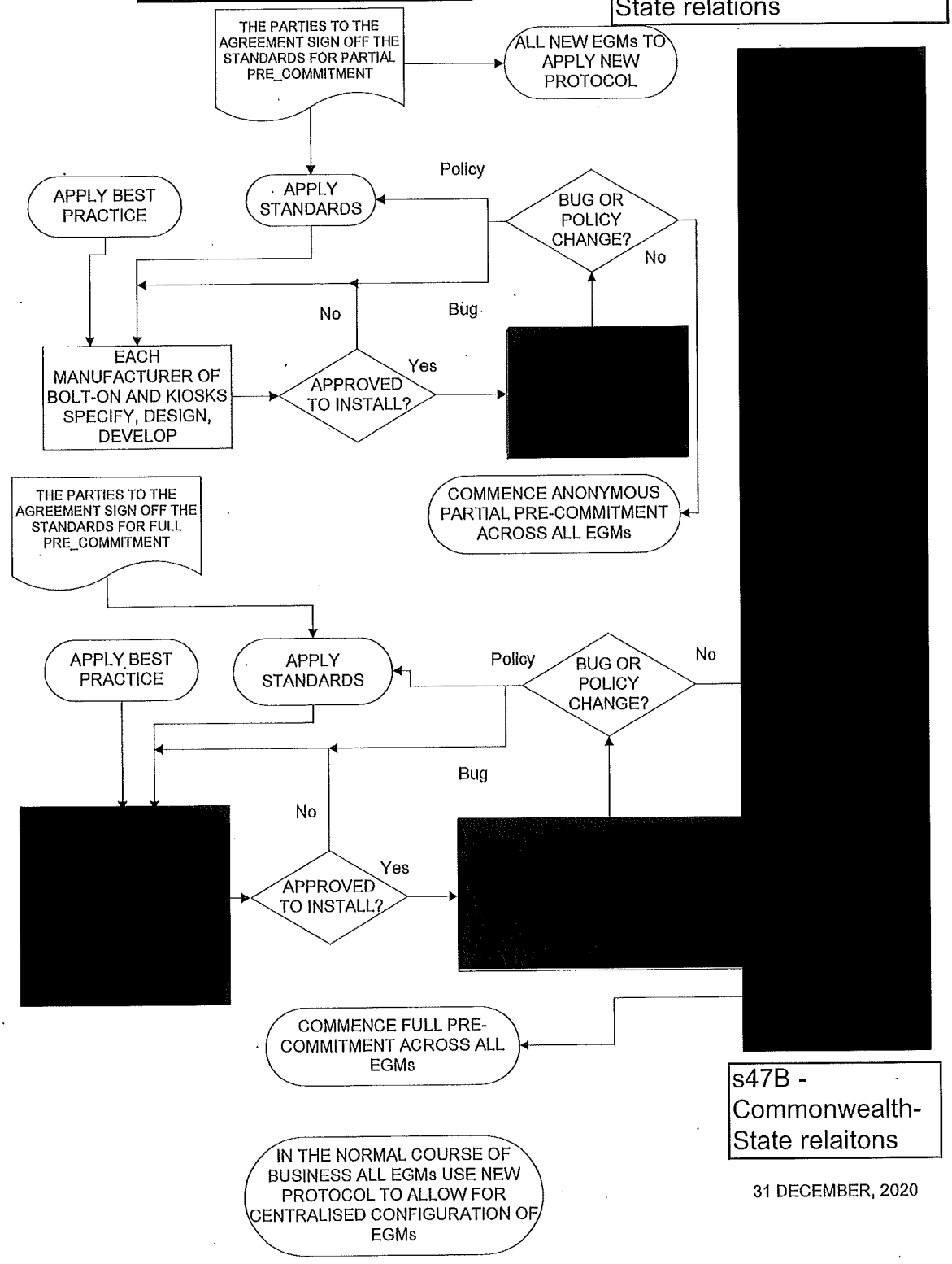
4.5.4 [redacted]



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PART IV

ANCILLARY ISSUES

5 BUSINESS RULES

This section addresses the Phase II Brief question of high level rules that could be generic across a range of products but not specific to or reliant on any particular software product or provider/manufacturer.

Section 2.7.8 also outlines some requirements for the establishment of business operations.

5.1 INFRASTRUCTURE DESIGN REQUIREMENTS

Part I of this report established that the infrastructure design objectives for a *'best practice full pre-commitment scheme – that is uniform across all states and territories and machines'* and that provides for maximum flexibility in policy are as follows:

[redacted]

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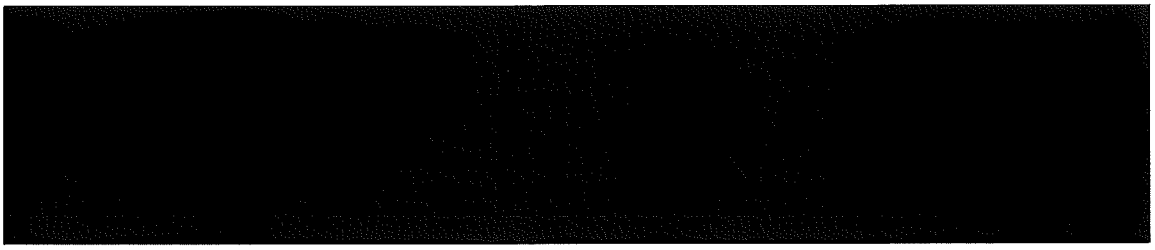

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5.3 REFORM RELATIONSHIPS

This section addresses the Phase II Brief question of the extent to which the technological issues associated with a pre-commitment scheme and dynamic warning and cost of play displays are interlinked.

a) 'Dynamic warning' and 'cost-of-play' that are session based (i.e. have an anonymous player) are independent of a pre-commitment solution.

b) 'Dynamic warning' and 'cost-of-play' that are targeted to a known player are dependent on an ID (e.g. card based) and account-based solution in some form: loyalty, cashless, pre-commitment:

c) Conversely, a full pre-commitment solution could be built upon dynamic warning and cost-of-play that are targeted to a known player.

d) Where dynamic warning can be implemented, so can cost-of-play given common design requirements.

5.4 METHODS OF REFORM

5.4.1 Core Methods

All three reforms[63] are predicated on:

a) Collection of play data (the input),

b) Analysis of play data (the execution),

c) Determination and output, resulting in:

   i. One or more instructions to be interpreted and acted upon by gaming equipment.

   ii. Information to be displayed to the player.

d) The possibility of forced or voluntary action as a consequence of a player or system determination.

[63] full pre-commitment scheme, dynamic warning and cost of play display.

5.4.2 Message Display

A 'pop-up message' is one which periodically appears on a display.

From a design point of view, one needs to define a software class for: '*Pop Up Message*', which has defined attributes.

Within this class will be software objects with different attributes:

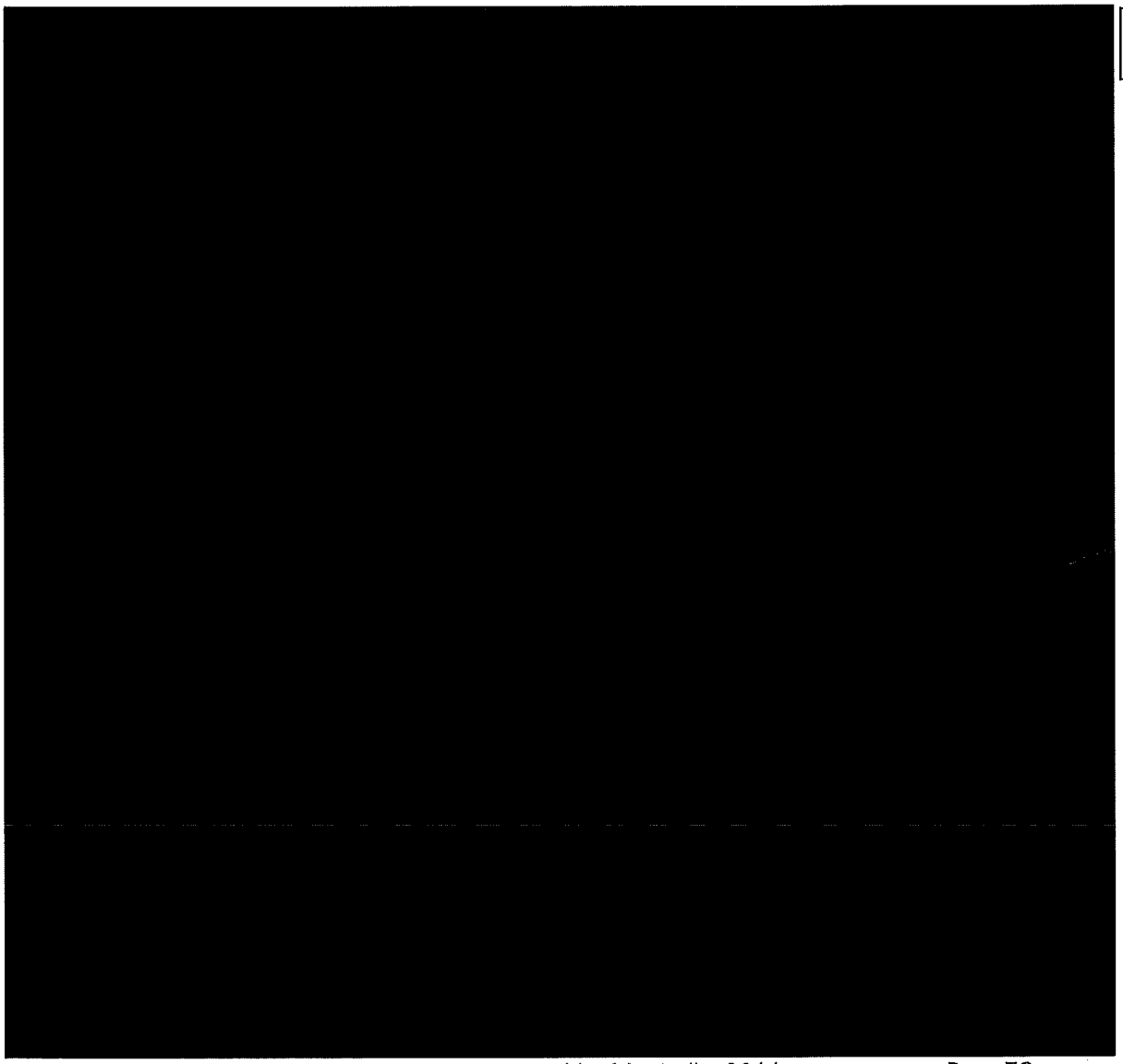
a) Dynamic warning messages,

b) Cost-of-play messages,

c) Pre-commitment messages,

d) Perhaps new responsible gambling measures.

We are therefore not concerned with what is displayed, but rather that the design provides for the capability of displaying messages and possibly requiring or instigating action.



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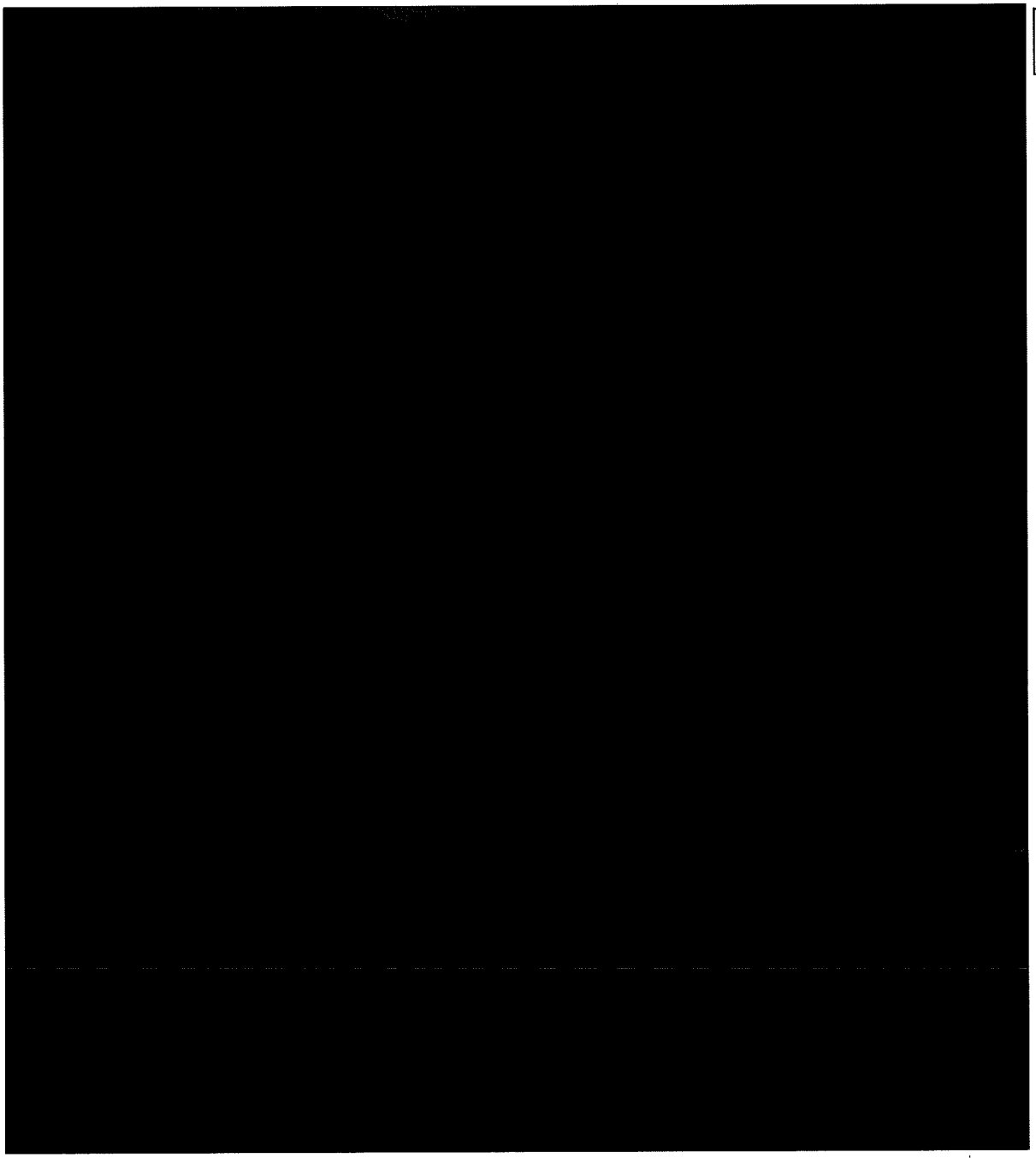
END OF REPORT

APPENDIX A: TIME FRAMES

A.1 PRE-COMMITMENT

With reference to The Agreement[67]: *"Implementation of pre-commitment arrangements will commence in 2012"*



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A.1.5.2 Dynamic Warning and Cost-of-Play

There are no time limits in The Agreement, for dynamic warning and cost-of-play display.

However, it is established in this report[73] that 'cost-of-play' and dynamic warnings that are player specific could be integrated with a full pre-commitment solution[74]. Therefore, it would be logical to apply a deadline which is consistent with full pre-commitment - post 31 December, 2014.

[73] Ibid. 5.3

[74] Ibid Error! Reference source not found.

APPENDIX B: DEFINITION OF FULL PRE-COMMITMENT

B.1 DEFINITION OF 'Full Pre-Commitment'

With reference to The Agreement[75]:

> *"full pre—commitment scheme commencing in 2014"*
>
> *"The full pre-commitment scheme will **include** the use of technology that is expected to have the **best chance** of **reducing problem gambling.**"*

[redacted] s47G - business

[redacted] s47G - business

[redacted] s47G - business

B.3 PRODUCTIVITY COMMISSION RECOMMENDATIONS

As the government's commitment is a *"best practice full pre-commitment scheme – that is uniform across all states and territories and machines – consistent with recommendations and findings of the Productivity Commission,"* we now explore the productivity commission's report to further define the objective.

B.3.1 Partial Pre-Commitment

Section 10.5 of the 2010 Productivity Commission Report defines partial pre-commitment as follows:

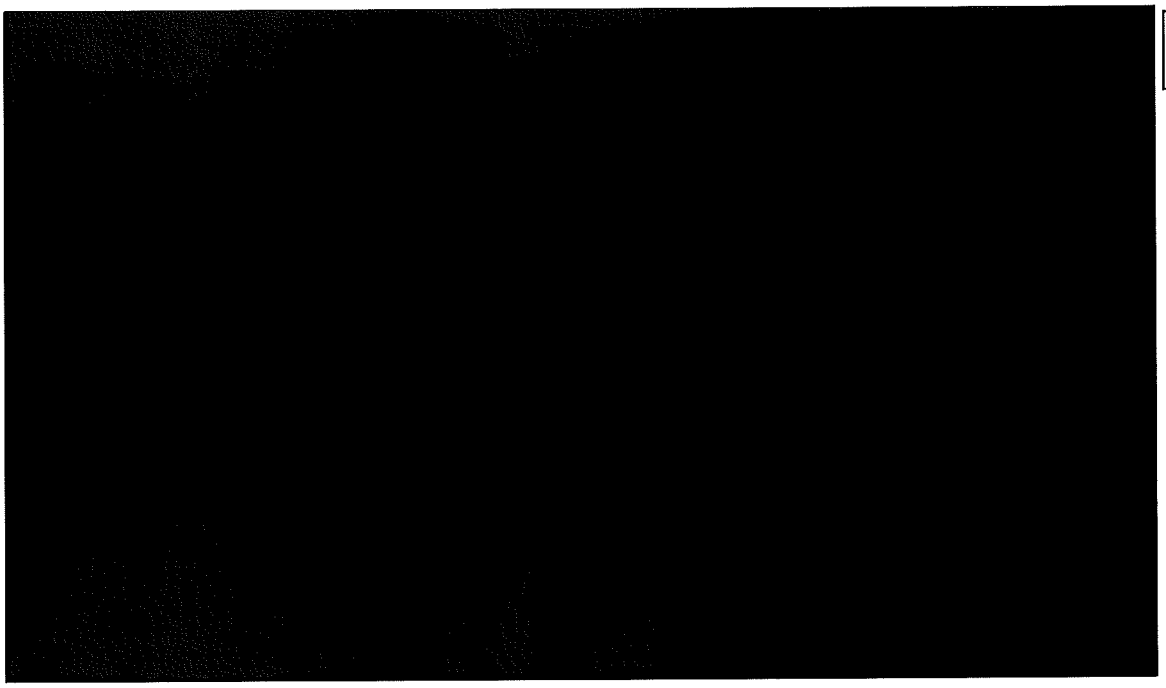
[78] Ibid. 3.6

The model usually proposed for partial pre-commitment involves:

a) *the voluntary uptake of an identifying device, typically a loyalty card, with gaming machines fully operational for players who are not enrolled.*

b) *player-determined spending[79] and time limits, reminders and transaction records. In fact, gamblers rarely use time limits when included as a system feature (appendix C[80]), suggesting that people do not see control over time spent as a problematic issue for them.*

c) *an audible and/or visual warning when a limit is reached and a short break in play. Since the player could move to another machine and play unhindered, any consequence for breaching a limit must necessarily be small.*



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B.3.2 Full Pre-Commitment

Section 10.6 of the 2010 Productivity Commission Report defines full pre-commitment as follows:

In contrast to partial pre-commitment, full pre-commitment focuses on limiting 'leakage[81]'. The very concept of pre-commitment is that it is a contract that

[79] It is understood that spend is meant to be net loss (win less bet).

[80] of the Productivity Commission's Report, 2010.

[81] *Leakage as defined by the Productivity Commission*: the capacity of a player to circumvent any pre-set limit (such as by swapping player identification devices or playing on another gambling form not covered by the pre-commitment system)

parties cannot breach without significant consequences. This feature gives relief to a party who is concerned about their future capacity for control. For instance, such a system could allow players to set a limit and when they reached that limit, further play would be prevented, regardless of the machine or venue.

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APPENDIX C: BEST PRACTICE

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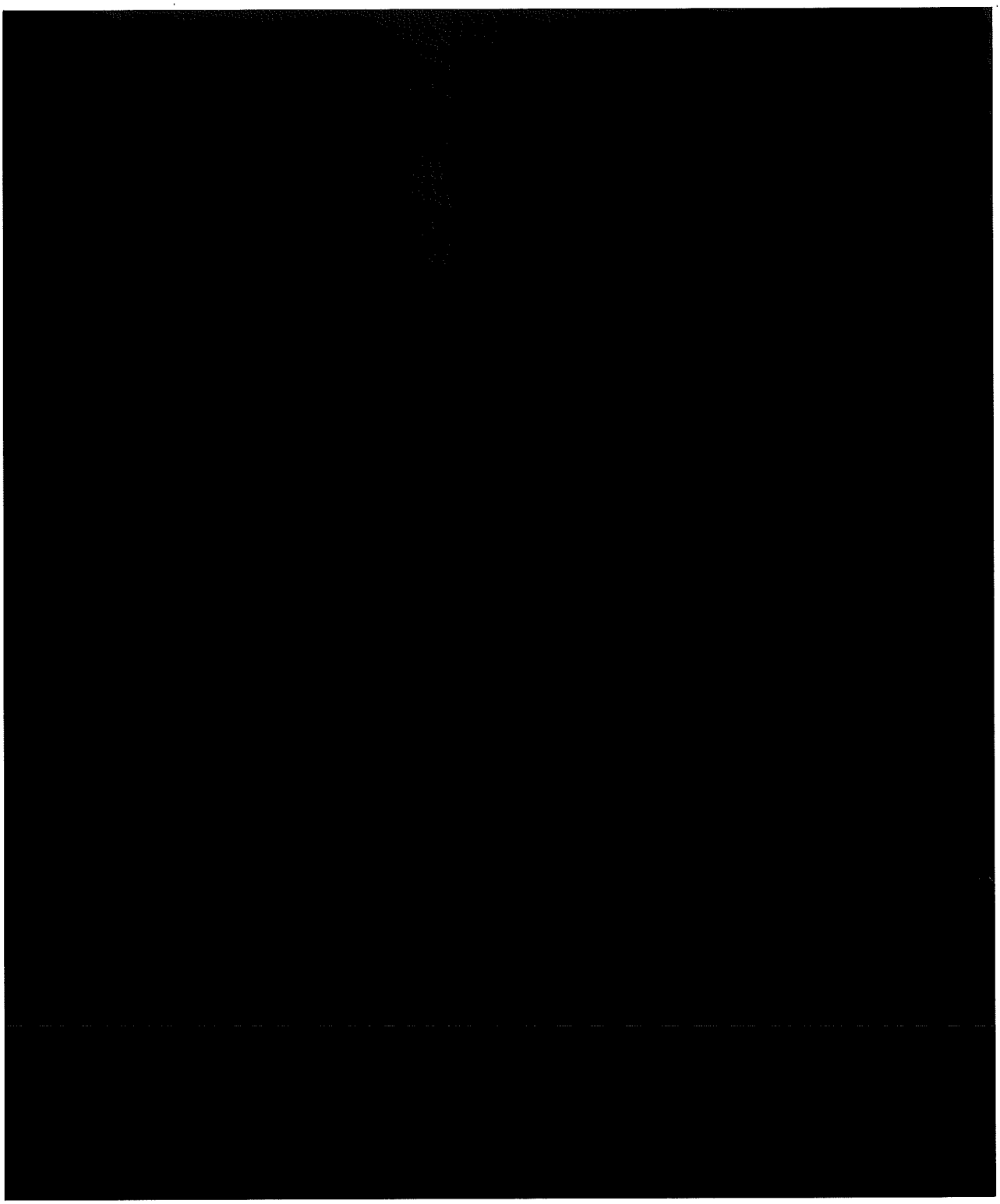

C.4 BEST PRACTICE DESIGN PRINCIPLES

CONSULT ALL STAKEHOLDERS

(Stakeholder requirements = effective technical requirements)

KEEP IT SIMPLE

(Make it simple and familiar for users)

(Avoid Software and Hardware changes)

DO NOT REINVENT THE WHEEL

(Leverage what is out there in the marketplace)

AVOID (B)LEADING EDGE TECHNOLOGY

(Transition untried solutions in, only after proof of efficacy)

MANAGE RISK

(Demonstrate practical solutions prior to implementation)

(Follow Industry Accepted Standards)

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D.3.5 Regulatory Control Requirements

[Design, Implementation, Operation]

Common to all jurisdictions is the requirement that before gaming technology is able to be placed into operation by a licensed operator, the following proof of reasonable compliance with the regulatory requirements must be demonstrated:

a) licensing of vendors and operators,

b) approval of testers,

c) compliance of the technology with technical standards,

d) compliant configuration and installation of the technology,

e) compliant environment in which the technology is to operate (both physical and logical),

f) effective system of operational internal controls,

g) capable operating staff.

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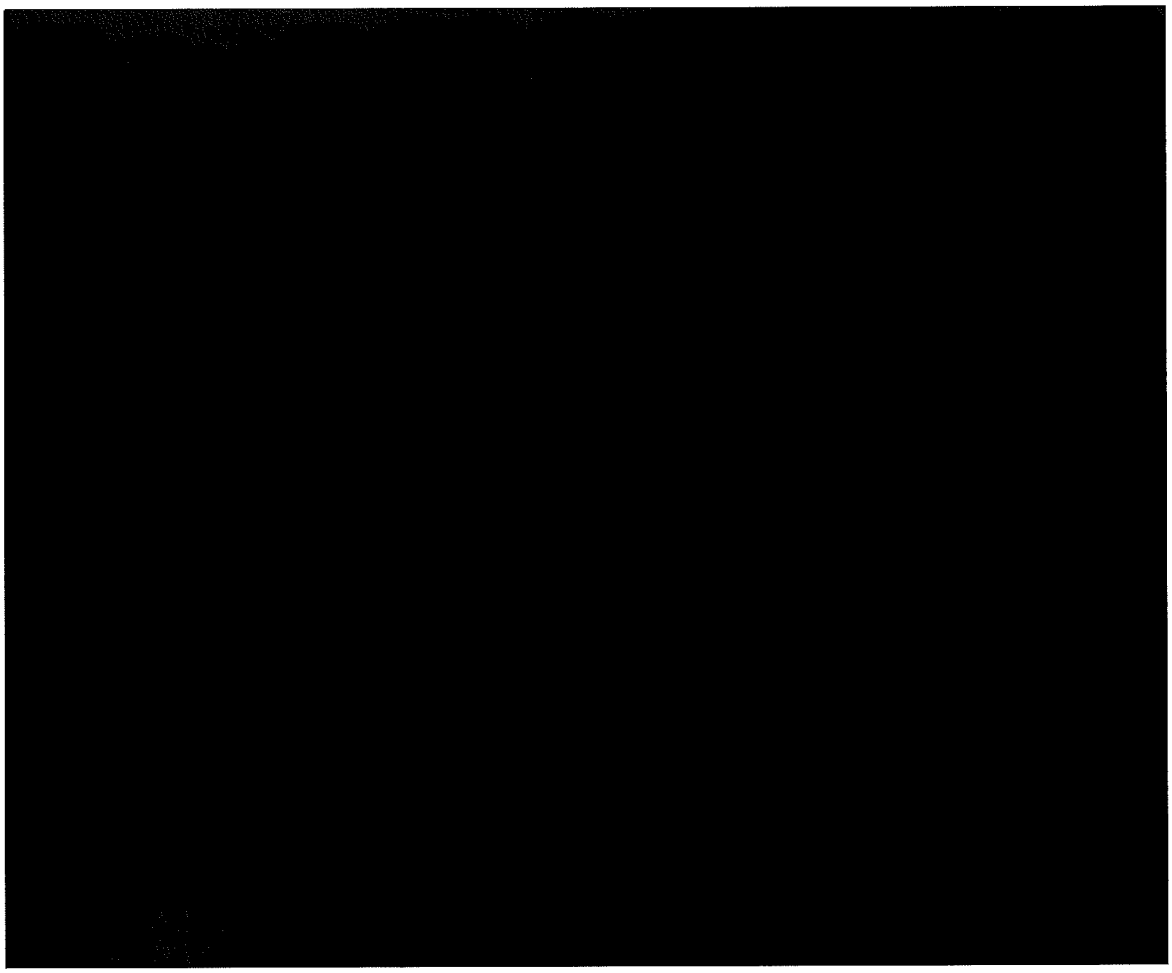
[redacted]

APPENDIX E: POLICY FLEXIBILITY

E.1 INTRODUCTION

A solution which is 'future-proof' will provide for future changes to policy parameter to be quickly, cheaply and simply deployed.

A future-proof solution will require additional system functionality and have significant design implications which must be accommodated for up-front to avoid substantial infrastructure upgrades or replacements in the future.



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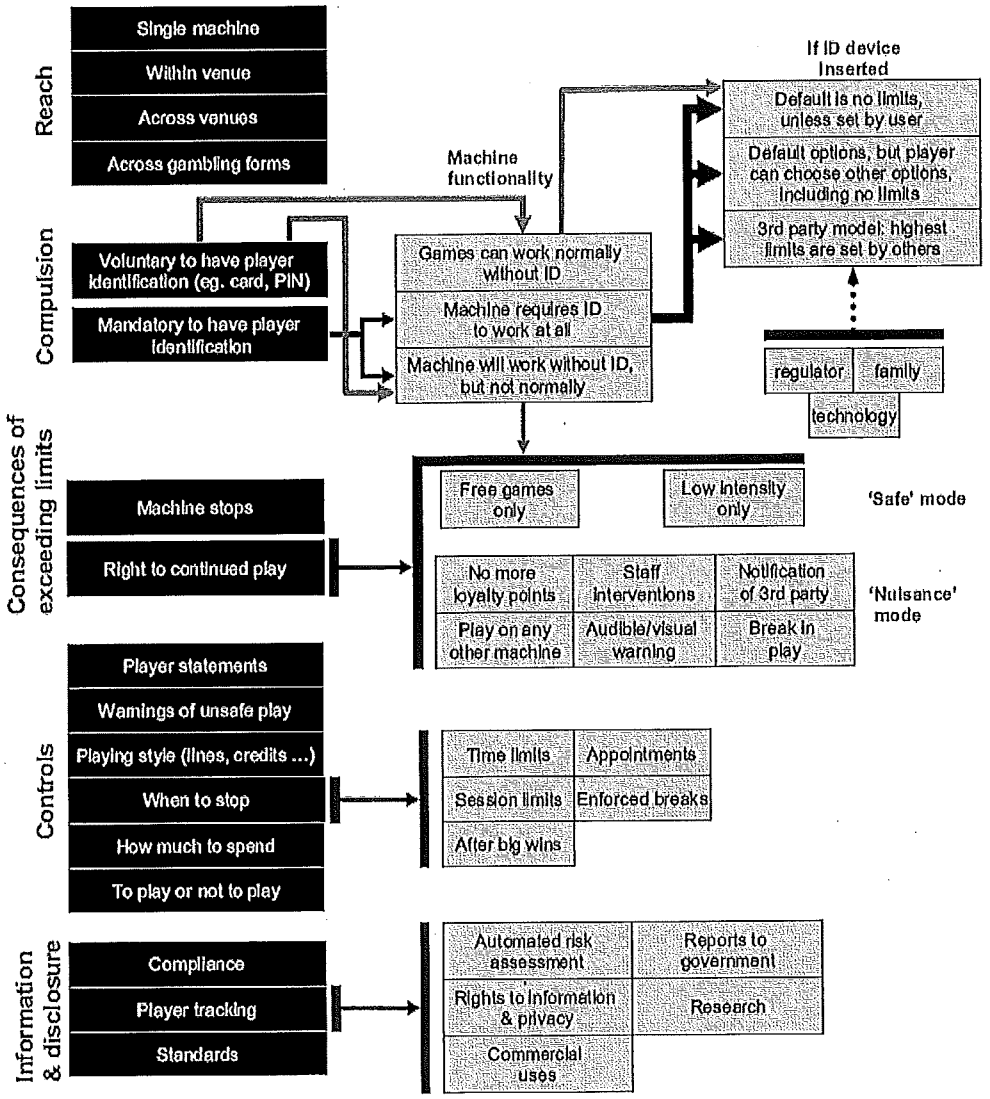
APPENDIX G: PRE-COMMITMENT OPTIONS

The diagram below is extracted from the Productivity Commission Inquiry Report, Volume 1, No. 50, 26 February, 2010.

Figure 10.1 **Key pre-commitment options**[a]



[a] In all systems, identification requirements relate to use of the machine, not to any requirement for patrons to identify themselves to venue staff. As is the case with using an ATM or online account, a player would use a card, PIN or some other method to gain private access to their settings.

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STATE	Est Total EGM Capacity
NSW (ACT)	105,700
QLD	47,490
SA	13,883
VIC	30,000
WA	1,750
TAS	3,680
NT	2,195
TOTAL EGM CAPACITY	204,698

[redacted]

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APPENDIX I: KEY CRITERIA CHECKLIST

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AREA OF INTEREST	KEY CRITERIA								
		Part	Full	Part	Full	Part	Full	Part	Full
Partial pre-commitment standards agreed to by the parties		Y		Y		Y		Y	
Full pre-commitment standards agreed to by the parties.			Y		Y		Y		Y
Dynamic warning and cost of Play specified and designed.			Y		Y		Y		Y
Full pre-commitment, targeted dynamic warning and cost of play operational.			Y		Y		Y		Y

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AREA OF INTEREST	KEY CRITERIA							
		Part	Full	Part	Full	Part	Full	Part	Full
Dynamic Warning and Cost of Play	Flexibility in the algorithms and in modification of message content.	N	Y	N	Y	N	Y	Y	Y
Pre-Commitment	Track spending limits.	Y	Y	Y	Y	Y	Y	Y	Y
	On-line and real-time communications to a point in the system performing analysis, (ID issue and validation)	Y	Y	Y	Y	Y	Y	Y	Y
	A database to baseline and mine data for analysis.	N	Y	N	Y	N	Y	Y	Y
	Player limits independent of EGM and venue (that is, not Session Based).	Y	Y	Y	Y	Y	Y	Y	Y
	All EGMs have an ability to communicate with a system or device that determines validity of an identity (ID).	N	Y	N	Y	N	Y	Y	Y

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AREA OF INTEREST	KEY CRITERIA								
		Part	Full	Part	Full	Part	Full	Part	Full
Pre-Commitment	All EGMs have an ability to communicate with a system or device that enables an assessment of current play against limit values.	Y	Y	Y	Y	Y	Y	Y	Y
	Contains inherent flexibility in design to permit required functionality to trial-and-error and implement future policy change when national protocol is implemented. (Limited for all Q-Com EGMs only, at present)	N	Y	N	Y	N	Y	N	Y
	Allow for EGM disable as the default EGM state.	Y	Y	Y	Y	Y	Y	Y	Y

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AREA OF INTEREST	KEY CRITERIA								
		Part	Full	Part	Full	Part	Full	Part	Full
Pre-Commitment	Allow for 'safe play' as the default EGM state when national protocol is implemented. (Currently, only Q-Com EGMs allow for this).	Y	Y	N	Y	N	Y	N	Y
	Applies to all EGMs.	Y	Y	Y	Y	Y	Y	N	Y
	Accommodate the prospect of mandatory player participation.	N	Y	N	Y	N	Y	Y	Y
Best practice 3 = Difficult 2 = Possible 1 = Practical	Processes	3	3	2	1	2	1	3	2
	Design	3	3	2	1	2	1	3	2
	Regulation	3	3	2	1	2	1	3	2
Uniform across states and territories and EGMs	Supporting regulatory infrastructure	Y	Y	Y	Y	Y	Y	Y	Y
	Branding, marketing and consumer education	Y	Y	Y	Y	Y	Y	Y	Y

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AREA OF INTEREST	KEY CRITERIA							
		Part	Full	Part	Full	Part	Full	Part	Full
Uniform across states and territories and EGMs	Reaearch and development - Player Interaction	N	N	Y	Y	Y	Y	N	N
	R&D - Player Access (or identity) system	Y	Y	Y	Y	Y	Y	N	N
	Technical infrastructure roll-out	N	Y	Y	Y	Y	Y	N	N
	Establishment of operations	Y	Y	Y	Y	Y	Y	Y	Y
Policy Flexibility	Application of best practice principles	N	Y	Y	Y	Y	Y	N	Y
	Centralised control	N	Y	N	Y	N	Y	Y	Y
	Uniform infrastructure	N	N	Y	N	Y	Y	N	N
	National ID and control system	N	N	N	N	N	Y	N	Y
	National communications protocols to each level of control in the network.	N	N	N	N	N	Y	N	Y
	Adoption of smart-card.	Y	Y	Y	Y	Y	Y	Hybr	Hyb

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AREA OF INTEREST	KEY CRITERIA	Part	Full	Part	Full	Part	Full	Part	Full
								id	rid
Policy Flexibility	Design for policy flexibility through content and values (remote configuration and passing of parameters and configurable messages).	N	Y	N	Y	N	Y	N	Y
	Maximise the use of downloadable 'plug in' software modules (which are single sourced for maximum uniformity and policy flexibility).	N	Y	Y	Y	Y	Y	N	Y

A key assumption is that all pre-requisites (e.g. regulatory infrastructure, etc.) are in place.

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