

**From:** [REDACTED]@acma.gov.au>  
**Sent:** Tuesday, 28 May 2019 11:21 AM  
**To:** [REDACTED]  
**Cc:** IG Taskforce; [REDACTED]; L\_ Lottoland E\_mails  
**Subject:** RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [TAH-Production.FID72144]  
[SEC=UNCLASSIFIED]

Dear [REDACTED]

Thank you for your email.

We have noted this additional information.

Kind regards

[REDACTED]

[REDACTED]  
A/g Executive Manager  
Content Safeguards Branch

Australian Communications and Media Authority

[REDACTED]  
[REDACTED]

[\[REDACTED\]@acma.gov.au](mailto:[REDACTED]@acma.gov.au)



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**From:** [REDACTED]@tabcorp.com.au>  
**Sent:** Tuesday, 28 May 2019 10:45 AM  
**To:** [REDACTED]@acma.gov.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED]@tabcorp.com.au>; L\_ Lottoland E\_mails <{F72144}.Production@wcs.tabcorp.com.au>  
**Subject:** RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [SEC=UNCLASSIFIED] [TAH-Production.FID72144]

Dear [REDACTED]

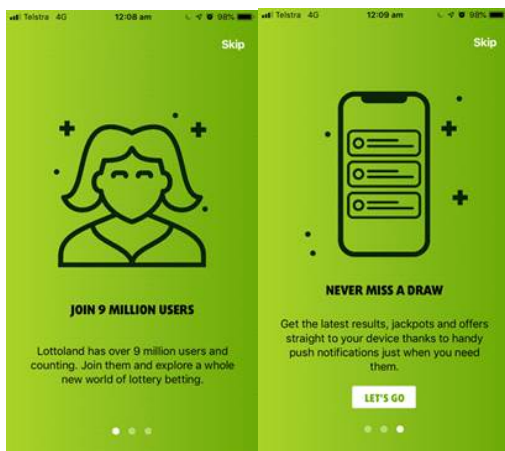
Thank you for your email.

Something I neglected to include in my last email was the screenshots below which are the 'welcome pages' users of the Lottoland app receive as they open the app for the first time.

We note the continued references to 'draws' and 'lottery betting' despite the recent amendments to the *Interactive Gambling Act* banning operators from offering betting on the outcomes of lotteries.

Kind regards

[REDACTED]



██████████ ██████████  
GENERAL COUNSEL – LOTTERIES & KENO

██████████ ██████████  
██████████ @tabcorp.com.au

**Tabcorp Holdings Ltd**  
Level 2, 87 Ipswich Road  
Woolloongabba QLD 4102



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**From:** ██████████ @acma.gov.au>  
**Sent:** Friday, 24 May 2019 2:40 PM  
**To:** ██████████ @tabcorp.com.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>; ██████████ @tabcorp.com.au>; L\_ Lottoland E\_mails <(F72144).Production@wcs.tabcorp.com.au>  
**Subject:** RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [TAH-Production.FID72144] [SEC=UNCLASSIFIED]

Dear ██████████

Thank you for your email and the further information you have provided regarding Lottoland's advertising activities.

Our investigation is still underway but, as advised previously, we will inform you when it has been finalised.

Kind regards,

██████████

██████████  
A/g Executive Manager  
Content Safeguards Branch

Australian Communications and Media Authority

██████████

██████████

██████████ @acma.gov.au



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**From:** [REDACTED] <[REDACTED]@tabcorp.com.au>  
**Sent:** Friday, 24 May 2019 2:11 PM  
**To:** [REDACTED] <[REDACTED]@acma.gov.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>; [REDACTED] <[REDACTED]@tabcorp.com.au>; L\_ Lottoland E\_mails <{F72144}.Production@wcs.tabcorp.com.au>  
**Subject:** RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [SEC=UNCLASSIFIED] [TAH-Production.FID72144]

Dear [REDACTED]

We appreciate your ongoing consideration of this matter.

Since Tabcorp's original complaint in January 2019 and the additional information sent to ACMA earlier this month, Lottoland has continued to heavily advertise its new product which we believe is a sidestep of the *Interactive Gambling Act* (IGA) amendments.

We have now sourced the following additional information which we thought might be useful as you complete your investigation:

1. There is some evidence of improved performance of the Lottoland app in the Average App Rankings in the IOS Store. Such rankings are seen as a dominant factor in how many downloads an app will receive. We believe there is a likely connection with the increased advertising program and the volume of Lottoland app downloads;
2. Estimated web traffic to lottoland.com.au is also starting to grow again with a significant increase over the past month; and
3. Brand tracking surveys indicate that both awareness & usage of Lottoland is starting to trend upwards (post the 9 January commencement of amendments to the IGA).

I appreciate it has been only 3 weeks since my last contact, but, we think this further information is relevant and that the investigation remains significant as continued growth of this product will have a negative impact on over \$1 billion state / territory tax revenues used for hospitals, sports and charities and risks downward pressure on the incomes of around 3,800 lottery and newsagents across Australia – many of whom are mum and dad small business operators.

Many thanks for your ongoing engagement with us on this matter.

Yours sincerely

[REDACTED]

[REDACTED]  
[REDACTED]  
GENERAL COUNSEL – LOTTERIES & KENO

[REDACTED]  
[REDACTED] <[REDACTED]@tabcorp.com.au>

**Tabcorp Holdings Ltd**  
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**From:** [REDACTED] <[REDACTED]@acma.gov.au>  
**Sent:** Wednesday, 1 May 2019 12:55 PM  
**To:** [REDACTED] <[REDACTED]@tabcorp.com.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>; L\_ Lottoland E\_mails <{F72144}.Production@wcs.tabcorp.com.au>  
**Subject:** RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [TAH-Production.FID72144] [SEC=UNCLASSIFIED]

Dear [REDACTED]

Thank you for your email below regarding the formal complaint submitted by Tabcorp Holdings Limited about the services provided by Lottoland Australia Pty Ltd, made under the *Interactive Gambling Act 2001*. As flagged in my last correspondence with you on 18 March 2019, we are currently progressing the matter and will inform you when it has been finalised.

We have noted the additional information you have provided regarding Lottoland's advertising activities.

Kind regards,

[REDACTED]

[REDACTED]  
A/g Executive Manager  
Content Safeguards Branch

Australian Communications and Media Authority

[REDACTED]

[REDACTED]

@acma.gov.au



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From: [REDACTED] <[REDACTED]@tabcorp.com.au>

Sent: Tuesday, 30 April 2019 2:38 PM

To: [REDACTED] <[REDACTED]@acma.gov.au>

Cc: IG Taskforce <IGTaskforce@acma.gov.au>; L\_ Lottoland E\_mails <[F72144].Production@wcs.tabcorp.com.au>

Subject: RE: Follow up about Tabcorp complaint under IGA regarding Lottoland [SEC=UNCLASSIFIED] [TAH-Production.FID72144]

Dear [REDACTED]

Thank you for your update below.

We understand that gambling regulators may have been in contact with ACMA as it conducts its review of Lottoland's revised product offer. If you believe it would assist, we can provide further background around our engagement with other regulators to date.

Further, it may be of interest to ACMA that Lottoland has invested considerably in media advertising over the last month (compared with the period around the commencement of the lottery betting ban from 9 January). For example, data sourced from the Nielsen ADEX 2019 (an advertising measurement service) estimates that Lottoland spent approximately \$611,000 across TV and radio in the week commencing 7 April.

I note that this weekly amount is an estimate only which has been provided by Nielsen whose service works by scanning free-to-air TV, print, online display, radio, out-of-home, direct mail and cinema advertising and estimating advertisers' investment based on general market rates (as opposed to actual rates).

I have attached an example of one of Lottoland's recent radio advertisements and samples of recent digital display advertisements are captured below.

We are concerned that Lottoland is now heavily promoting its product, which we consider to breach the Interactive Gambling Act, to a wide audience. We can provide further data regarding Lottoland's recent media investment if that would assist ACMA.

If Tabcorp can be of any further assistance at this point please let me know. Otherwise, we look forward to hearing the outcome of ACMA's review in due course.

Kind regards

[REDACTED]



GENERAL COUNSEL – LOTTERIES &amp; KENO

[\[REDACTED\]  
\[REDACTED\]@tabcorp.com.au](mailto:[REDACTED]@tabcorp.com.au)

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**From:** [REDACTED] <[REDACTED]@acma.gov.au>  
**Sent:** Monday, 18 March 2019 6:24 PM  
**To:** [REDACTED] <[REDACTED]@tabcorp.com.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>  
**Subject:** Follow up about Tabcorp complaint under IGA regarding Lottoland [SEC=UNCLASSIFIED]

Dear [REDACTED]

I refer to your email to the Australian Communication and Media Authority (ACMA) today, following up on the progress of the formal complaint submitted by Tabcorp Holdings Limited regarding the services provided by Lottoland Australia Pty Ltd, made under the *Interactive Gambling Act 2001* (IGA).

I can advise that the ACMA's consideration of this matter is well progressed and we will inform you when it has been finalised.

Yours sincerely

A/g Executive Manager  
Content Safeguards Branch

**Australian Communications and Media Authority**

\_\_\_\_\_@acma.gov.au



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**From:** [REDACTED] <[REDACTED]@tabcorp.com.au>  
**Sent:** Monday, 18 March 2019 11:47 AM  
**To:** [REDACTED] <[REDACTED]@acma.gov.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>; L\_ Lottoland E\_mails <[F72144].Production@wcs.tabcorp.com.au>  
**Subject:** RE: Tabcorp complaint under IGA regarding Lottoland [SEC=UNCLASSIFIED] [TAH-Production.FID72144]

Dear [REDACTED],

I just wanted to follow up on the email below and see how ACMA's review was proceeding.

I appreciate that there are likely to be a few steps to work through on this. If we can be of any further assistance at this point please let me know.

Kind regards

[REDACTED]

[REDACTED] [REDACTED] GENERAL COUNSEL – LOTTERIES & KENO	
M [REDACTED] [REDACTED] <[REDACTED]@tabcorp.com.au>	<b>Tabcorp Holdings Ltd</b> Level 2, 87 Ipswich Road Woolloongabba QLD 4102

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**From:** [REDACTED] <[REDACTED]@acma.gov.au>  
**Sent:** Wednesday, 23 January 2019 10:17 AM  
**To:** [REDACTED] <[REDACTED]@tabcorp.com.au>  
**Cc:** IG Taskforce <IGTaskforce@acma.gov.au>  
**Subject:** Re: Tabcorp complaint under IGA regarding Lottoland [TAH-Production.FID72144] [SEC=UNCLASSIFIED]

Dear [REDACTED],

Thank you for your email below to the Australian Communications and Media Authority (ACMA), making a formal complaint on behalf of Tabcorp Holdings Limited regarding the services provided by Lottoland Australia Pty Ltd.

I note that this complaint is made under the *Interactive Gambling Act 2001* (IGA).

The ACMA will consider the information you have provided, as well as the services offered at Lottoland.com.au.

We will keep you informed of the progress of your complaint.

Yours sincerely

[REDACTED]

[REDACTED]  
A/g General Manager  
Content, Consumer and Citizen Division

Australian Communications and Media Authority

[REDACTED]

[REDACTED]

[REDACTED]@acma.gov.au

Executive Assistant [REDACTED]

[REDACTED]

[REDACTED]@acma.gov.au

[www.acma.gov.au](http://www.acma.gov.au)



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**From:** [REDACTED] [REDACTED]@tabcorp.com.au>

**Sent:** Tuesday, 22 January 2019 5:38 PM

**To:** [REDACTED]@acma.gov.au>

**Cc:** [REDACTED]@tabcorp.com.au>; L\_ Lottoland E\_mails <{F72144}.Production@wcs.tabcorp.com.au>

**Subject:** FW: Tabcorp complaint under IGA regarding Lottoland [TAH-Production.FID72144]

Dear [REDACTED],

I just received an email notification that [REDACTED] is currently on extended leave from ACMA and to direct queries to you.

Tabcorp had been communicating with [REDACTED] last year in relation to the services provided by Lottoland Pty Ltd.

We continue to hold concerns regarding Lottoland's product offer to consumers post the changes to the IGA which came into force on 9 January.

We would be grateful if ACMA would consider the attached letter which details the nature of our concerns.

Please do not hesitate to contact me if you require any further information regarding our complaint.

Kind regards

[REDACTED]

[REDACTED] [REDACTED]  
GENERAL COUNSEL – LOTTERIES & KENO



[REDACTED]  
[REDACTED]

[REDACTED]@tabcorp.com.au

**Tabcorp Holdings Ltd**

Level 2, 87 Ipswich Road  
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**From:** [REDACTED]

**Sent:** Tuesday, 22 January 2019 4:25 PM

**To:** [REDACTED]@acma.gov.au

**Cc:** [REDACTED]@tabcorp.com.au>

**Subject:** Tabcorp complaint under IGA regarding Lottoland

Dear [REDACTED],

Please find attached correspondence from Tabcorp regarding the services provided by Lottoland Australia Pty Ltd post 9 January 2019.

I have also attached for your convenience a copy of your letter to Tabcorp from April last year.

Please do not hesitate to contact me if you require any further information regarding our complaint.

Kind regards

■

■ ■  
GENERAL COUNSEL – LOTTERIES & KENO

■ ■  
■ ■@tabcorp.com.au

**Tabcorp Holdings Ltd**  
Level 2, 87 Ipswich Road  
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