

Til: Lovgivning og økonomi (lovgivning@oekonomi@skm.dk), Janani Jeyasothinayagam (JJ@skm.dk)
Fra: Cecilie Skalborg (Cecilie.Skalberg@betssongroup.com)
Titel: Betsson Group's consultation response on proposed Bingo Regulation
Sendt: 10-11-2017 15:48:04

Dear Sirs,

I have the pleasure to submit our feedback on the proposed Bingo Regulation in Denmark on behalf of Betsson Group. Betsson AB (publ), (NASDAQ Stockholm), is a holding company that invests in and manages companies within the online gaming sector, including BML Group Ltd, a company registered in Malta which, through its subsidiaries, offers remote gaming in accordance with licences issued in various territories within the EU namely Denmark, Malta, the United Kingdom, Ireland and Italy.

The current proposed rules for Online Bingo in Denmark have a number of unique elements which, if implemented, would make the game incompatible with Online Bingo games across all international and Regulated markets, significantly limiting the size of the Bingo market in Denmark. Betsson Group therefore fully agrees with the below feedback marked in red:

- (i) Tax: 20% across gross gaming revenue**
 - Online bingo will be added to the licence holder's existing online casino licence and taxed accordingly to this.
 - *We agree with this and believe this is a sensible approach to launching this new gaming option.*
- (ii) Online bingo will be allowed in 75- and 90- ball game formats.**
 - Bingo cards shall consist of five rows and five columns with 75 numbers or symbols, or three rows and nine columns with 90 numbers or symbols.
 - *Whilst we welcome the inclusion of the 75-ball and the 90-ball versions of Bingo, we note the exclusion of the 80-ball version. It is common practice to offer 80-ball Bingo where the card consists of four rows and four columns.*
 - *Further, the UK market has no restriction on the number of balls called in a game of bingo, allowing operators and software houses to develop unrestricted variations on the game giving customers maximum choice and variety. Regulation in Spain followed the same approach in 2013 (through Ministerial Order HAP/1998/2013) having previously allowed only 75-ball, 80-ball or 90-ball versions of the game. The Italian Regulator is currently in the process of adopting the same approach. This means that for a large and increasing Regulated marketplace unrestricted bingo formats are the norm.*
 - *We therefore recommend that no restriction is placed on the format of bingo games available to players in Denmark*
 - The printed numbers or symbols are drawn and called out one at a time.
 - *We agree with the proposed process for drawing and calling out numbers one at a time. This is aligned with other international Regulated markets.*
 - The player shall have an option to manually mark the printed numbers or symbols at all times.
 - *This option will be unique to Denmark and will require specific bespoke development that will have no practical use. Such an option will be frustrated by player connectivity issues and difficult to implement effectively across small hand held devices. We recommend that this rule be removed.*
 - The player may not choose the combination of numbers or symbols on the bingo card.
 - *We agree the players may not choose the combination of numbers or symbols on the bingo card. The numbers or symbols should be pre-generated, though the player should be allowed to choose a card or cards from the pre-generated cards produced as is the case in other international Regulated markets.*
- (iii) Cards made available to players no sooner than 10 minutes before a game starts.**
 - The purchase of bingo cards must, with the exception of online bingo provided via television, be possible no earlier than 10 minutes before the game starts.
 - *This rule would be unique to Bingo in Denmark, would single out Bingo as being the only game with a timing restriction thereby limiting consumer choice which would significantly restrict or even exclude the casual, impulse player who would safely and responsibly occasionally compete in such a game. This rule, if implemented, is likely to have a major impact on the viability of Bingo in Denmark. We recommend that this rule be removed.*
- (iv) Numbers or symbols will be called every three seconds, with the game stopped for 10 seconds each time a winner is called.**

- The game shall end when the first board has been completely filled.
 - *We agree with the proposal to end the game once the first board has been completely filled, though multiple winners should be allowed for various options during the game, for example the completing of a line or the four corners etc.*
 - *No other international Regulated market has a rule stating the speed at which numbers are called. This would be unique to Denmark and would make Bingo incompatible with other markets meaning international liquidity would be impossible – the game would not synchronize with games in other markets. We recommend that this rule be removed.*
 - *No other international Regulated market has a rule stating the specific length of time a game must be paused once a winner is called.. This would be unique to Denmark and would make Bingo incompatible with other markets meaning international liquidity would be impossible – the game would not synchronize with games in other markets. We recommend that this rule be removed.*

(v) **Players will be restricted to spending a maximum DKK175 per day on bingo cards.**

- This only applies to online bingo provided via television.
- There are no limitations to bingos offered via other channels.
 - *We agree with the proposal not to limit bingo offers through the online channel.*

Kind regards,

Cecilie Skalborg
Senior Compliance Manager
Betsson Group

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Høringssvar vedrørende udkast til bekendtgørelse om ændring af bekendtgørelse om onlinekasino (nye regler om onlinebingo), Deres j.nr. 2017-2867

Ved mail af 13. oktober 2017 har Skatteministeriet anmodet Danske Spil A/S (Danske Spil) om eventuelle bemærkninger til udkast til bekendtgørelse om ændring af bekendtgørelse om onlinekasino (nye regler om onlinebingo).

I den anledning skal Danske Spil oplyse følgende, idet bemærkes, at det nedenfor angivne er baseret på den betydelige erfaring, som Danske Spil igennem en årrække har opbygget i forhold til udbud af onlinebingo:

Indledningsvis bemærkes mere generelt, at det fremgår af bemærkningerne til lovforslaget om liberalisering af bingo, at liberalisering af onlinebingo har til formål at kanalisere spillerne fra et ureguleret marked ind i et reguleret marked med dertilhørende dansk beskyttelse af spillerne. Efter Danske Spils vurdering medfører en liberalisering af onlinebingo ikke nødvendigvis, at et sådant ureguleret marked forsvinder. Det afgørende i den forbindelse vil være, at de danske tilladelsesindehavere gives mulighed for at udbyde tilstrækkeligt attraktive og konkurrencedygtige spil for at kunne tiltrække de danske spillere ind i det regulerede marked med succes. Hertil kommer, at spillene skal være så attraktive, at de tillige kan konkurrere med andre lignende typer spil på markedet. I denne sammenhæng er det efter Danske Spils opfattelse overordnet set helt afgørende, dels at de danske tilladelsesindehavere gives mulighed for at tilbyde onlinebingospil på mobiltelefonen, dels at tilbyde spillerne deltagelse i netværksspil og netværks-jackpots, hvilket de nedenfor beskrevne foreslåede krav i udkastet til bekendtgørelse efter Danske Spils vurdering i et vist omfang vil hindre.

Endvidere har Danske Spil følgende mere konkrete bemærkninger til udkastets enkelte bestemmelser:

Ad spilkonto:

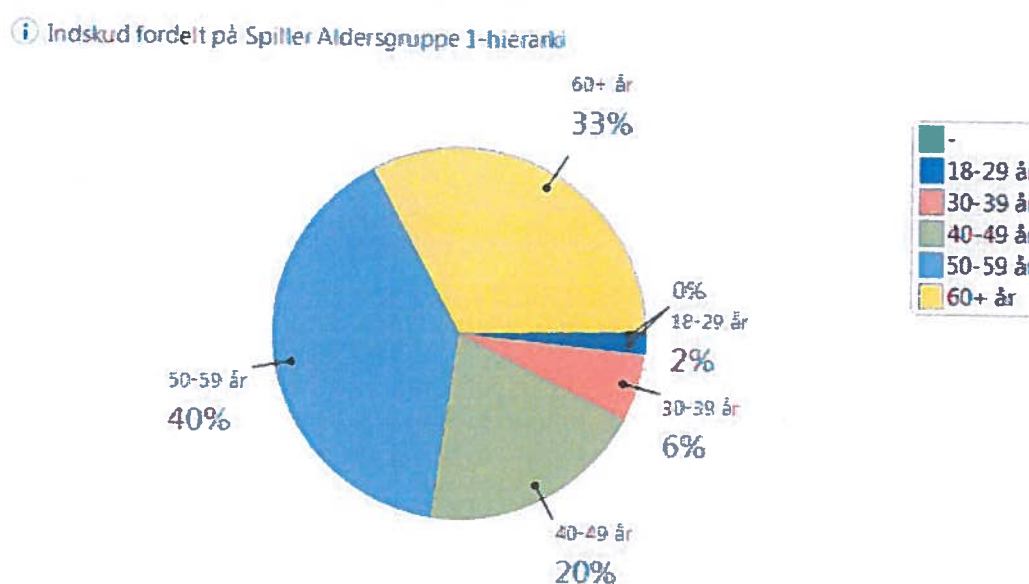
Det fremgår af § 11 b, stk. 2, at en spilkonto ikke kan bruges til ind- og udbetalinger i onlinebingo udbudt via tv. Efter Danske Spils opfattelse bør der ikke være forskel på betalingsmulighederne for henholdsvis spil afviklet via tv og via en hjemmeside. Efter Danske Spils vurdering er brug af spilkonto i begge situationer mere sikker og giver mulighed for at efterleve en række krav i forhold til at kunne sætte begrænsninger for eget spil, udelukke sig via ROFUS mv. Ud fra et beskyttelseshensyn i forhold til spillerne skal Danske Spil således henstille, at denne begrænsning af brug af spilkonto fjernes.

Ad krav til felter samt numre eller symboler:



Det følger af § 15 b, stk.1, nr. 1, at spilpladen skal bestå af fem gange fem felter og 75 numre eller symboler eller af tre gange ni felter og 90 numre eller symboler. Det bemærkes først og fremmest, at disse krav vil gøre det vanskeligt at udbyde spil via mobiltelefonen. Den digitale udvikling går stærkt, og i denne sammenhæng spiller mobiltelefonen en helt afgørende rolle. Flere og flere danskere anvender således mobiltelefon i stedet for en PC, herunder også til brug for spil. Danske Spil skal derfor henstille, at der åbnes mulighed for at tilbyde færre felter og numre eller symboler, således at spil på mobiltelefonen kan udbydes i et læsbart format. Ved at tillade dette vil man imødekomme kundernes ønske om spil via mobiltelefonen og øge den generelle bruger- og spilleoplevelse. Dette hensyn gør sig tillige gældende i forhold til den ældre målgruppe og svagtseende, hvor det også er afgørende, at der er mulighed for at udbyde bingo-spil i et læsbart format. Af figur 1 nedenfor fremgår det, at 40 % af Danske Lotteri Spils online-bingospillere i dag er i aldersgruppen 50-59 år, mens 33 pct. er over 60 år.

Figur 1: Indskud fordelt på aldersgruppe for onlinebingo



Endvidere skal Danske Spil henstille, at der gives mulighed for at udbyde forskellige felter samt numre og symboler for at sikre innovation og et bredt og attraktivt spiludbud på det danske marked.

Ad sammensætningen af numre eller symboler:

Det følger af § 15, stk. 2, at spilleren ikke selv må vælge sammensætningen af numre eller symboler på spilpladen. Det bemærkes i den forbindelse, at Danske Lotteri Spil inden spilstart i dag tilbyder spillerne mulighed for at vælge imellem nogle på forhånd prædefinerede spilplader. Spilleren sammensætter ikke selv numre eller symboler på spilpladen, men vælger blot en eller flere af de præsenterede spilplader. Med henblik på at sikre spillets fortsatte attraktivitet også på det liberaliserede marked er det efter Danske Spils vurdering væsentligt, at denne funktionalitet bibeholdes. Det bemærkes, at tilbagebetalingsprocenten ikke påvirkes ved ovenstående.

Ad kravet om minimum 3 sekunders interval mellem udtrukne numre eller symboler:

Det følger af § 15, stk. 3, nr. 1, at tilladelsesindehaveren skal sikre, at præsentationen af udtrukne numre eller symboler sker med minimum 3 sekunders interval.



Efter Danske Spils vurdering vil denne regel om 3 sekunders interval mellem præsentationen af udtrukne numre eller symboler begrænse tilladelsesindehavernes mulighed for at udbyde netværksspil og netværks-jackpots, da spillene i netværk - ifølge oplysninger fra Danske Spils leverandør af bingospil, der sælger onlinebingospil globalt - ikke afvikles således, at der er minimum 3 sekunders interval mellem de udtrukne numre eller symboler. Såfremt dette krav opretholdes, vil danske spillere de facto ikke kunne deltage i netværksspil. Dette kan i sidste ende have som konsekvens, at nogle spillere opsøger sådanne spil og muligheden for deltagelse i bl.a. netværks-jackpots på et ulovligt marked.

Hertil kommer, at det må forventes, at spiludbuddet på det danske marked i betydeligt omfang bliver begrænset, da spiludbyderne også vil være begrænset i at udbyde en række andre onlinebingospil end netværksspil, såfremt ovenstående krav fastholdes.

Kravet om 3 sekunders interval kendes allerede i dag fra onlinekasinospil. Forskellen er dog, at kravet for onlinekasinospil vedrører intervallet mellem hvert købt onlinekasinospil, mens ovennævnte krav gælder præsentationen af hvert udtrukket nummer eller symbol. Disse krav er derfor ikke sammenlignelige.

Danske Spil henstiller til, at dette krav fjernes, således at bl.a. deltagelse i netværksspil og netværks-jackpots ikke udelukkes, hvilket vil være centralt for etablering, fastholdelse og udvikling af onlinebingo på det danske liberaliserede marked.

Ad kravet om minimum 10 sekunder mellem hver gevinstgivende begivenhed:

Det følger af § 15, stk. 3, nr. 2, at tilladelsesindehaveren skal sikre, at spillet sættes i bero i minimum 10 sekunder mellem hver gevinstgivende begivenhed.

Danske Spil har forstået kravet således, at spillet skal sættes i bero mellem hver fuld spilplade og et nyt spil og ikke mellem hver rækkegevinst. Såfremt sidstnævnte dog gør sig gældende, skal Danske Spil oplyse, at ifølge oplysninger fra Danske Spils leverandør af onlinebingospil kendes et sådant krav ikke fra det liberaliserede marked for onlinebingospil i andre lande. Et sådant krav vil have som konsekvens, at spillet vil blive forlænget unødigt, hvilket i meget væsentlig grad vil skade spilleoplevelsen og loyaliteten mod spilproduktet med betydelig fare for, at spillerne vil søge imod andre spillemuligheder, herunder spil på det ulovlige marked.

Ad første fuldt markerede spilplade:

Det følger af § 15, stk. 4, at spillet skal afsluttes ved første fuldt markerede spilplade. Det bemærkes i den forbindelse, at der på mange af de liberaliserede markeder i andre lande gives mulighed for flere vinderoplevelser, således at bingospillet først afsluttes efter to eller flere fulde spilplader. Dette øger antallet af vindere og chancen for at vinde. Fænomenet kaldes "roll-on bingo". Danske Spil henstiller til, at der gives mulighed for flere fuldt markerede spilplader, før spillet afsluttes.

Ad køb af spilplader:

Det følger af § 15, stk. 5, at køb af spilplader, med undtagelse af onlinebingo udbudt via tv, tidligst må foretages 10 minutter før spillets begyndelse. I dag er der mulighed for såkaldt pre-buy, d.v.s. køb af onlinebingospil på forhånd uden nogen tidsbegrænsning. Det er en mulighed, som spillerne i høj grad benytter sig af, og ca. 10-12 pct. af Danske Spils onlinebingospil i dag er købt mere end 10 minutter før spillets begyndelse. Pre-buy er desuden almindeligt kendt fra onlinebingospil på de liberaliserede markeder i andre lande. Denne mulighed ser Danske Spil som en øget service til kunden, som dermed kan planlægge sit spil på forhånd. Ved deltagelse i spil i netværksrum, hvor spillene indimellem afvikles i andre tidszoner, er det i særlig grad nyttigt, at spilleren gives mulighed for at planlægge og købe sit onlinebingospil på forhånd. Danske



Spil henstiller til, at der gives mulighed for køb af onlinebingospil på forhånd uden nogen tids-
mæssig begrænsning.

Danske Spil har ikke i øvrigt bemærkninger til udkastet.

Med venlig hilsen


Susanne Mørch Koch
administrerende direktør

Skatteministeriet

9. September 2017

Høringssvar til forslag til bekendtgørelse nr. 773 af 9. juni 2017 om onlinekasino

Generelle bemærkninger

DOGA skal indledningsvist udtrykke sin glæde over, at regeringen har vedtaget en liberalisering af onlinebingo. Der har i Danmark været en stor interesse for onlinebingospillet, og før liberaliseringen i 2012 var omsætningen på onlinebingo i Danmark nået et anseeligt niveau. Desværre har onlinebingo siden liberaliseringen vantrivedes i statsmonopolet, og der ligger en stor opgave for spiludbyderne i at genoprette interessen for spillet hos danskerne.

For at gøre udbuddet af onlinebingo til en succes er det særdeles vigtigt, at spiludbyderne gives de rette betingelser for at udbyde de samme spil, som internationalt er populære hos spillerne – på tværs af landegrænser. Desværre synes der i de foreslåede regler at have været for meget fokus på præskriptive regler, der begrænser onlinebingoproduktet. Begrænsningerne er så indgribende, at DOGA tvivler på, at onlinebingo i den foreslåede regulering ville kunne blive en succes.

International sammenligning

Således lægges der i bekendtgørelsesforslaget op til en regulering af onlinebingo, der adskiller sig fra reguleringen i andre europæiske lande, hvor onlinebingo er liberaliseret. I Italien, Spanien og UK, er reglerne til en vis grad "harmoniseret", så de er tilpasset de produkter, der udbydes i industrien. Det foreslås, at Danmark lægger sig op af disse regelsæt.

Forslag til ændringer i de enkelte bestemmelser

DOGA foreslår en række justeringer af bekendtgørelsesteksten, som vil gøre, at de danske onlinebingoregler flugter med internationale standarder, så spiludbyderne har mulighed for at udbyde de mest populære onlinebingospil til de danske spillere.

1) Vedr. § 15 b, nr. 1 (75/90 tal):

I denne bestemmelse, foreslås det, at spilpladen skal bestå af fem gange fem felter og 75 numre eller symboler eller af tre gange ni felter og 90 numre eller symboler. Denne bestemmelse afviger væsentlig fra

de regler, der er fastsat i UK og i Spanien, hvor spiludbyderne tillades at anvende en valgfri række af numre. I Italien forventes snarest at fastsætte, at spiludbyderne kan anvende en valgfri serie af numre og symboler – dog maksimalt 100.

Bestemmelsen i den foreslåede § 15 b, stk. 1, nr. 1, er unødigt præskriptiv og begrænsende og vil medføre, at spiludbyderne kun kan udbyde en del af de populære spil, der findes på markedet – dvs. udelukkende de spil der er baseret på en 75/90 kombination af numre.

DOGA foreslår, at bestemmelsen ændres, således at spiludbyderne kan anvende flere kombinationer af antal numre end 75 og 90.

2) Vedr. § 15 b, nr. 3 (manuel dupning af tal)

I bestemmelsen foreslås det, at spilleren skal have mulighed for løbende at foretage manuel markering (dupning) af udtrukne numre eller symboler.

Denne regel findes ikke i lovgivningen i UK, Italien og i Spanien, og spiludviklere af onlinebingospil vil derfor skulle anvende ressourcer til udvikle funktionen til spil på de danske marked. Samtidig vil det være teknisk vanskeligt at implementere en funktion med manuel markering på mobile platforme.

Desuden, henset til, at det for spilleren er frivilligt at anvende funktionen, og at manuel dupning ikke har nogen indflydelse på afviklingen af spillet, virker reglen unødigt administrativt bebyrdende.

DOGA foreslår derfor, at reglen udgår.

3) Vedr. § 15, stk. 2 (sammensætning af tal)

I henhold til bestemmelsen må spilleren ikke selv vælge sammensætningen af numre eller symboler på spilpladen. DOGA støtter som udgangspunkt, at spilleren ikke kan vælge, hvilke numre eller symboler, der skal være på bingopladen. Numrene eller symbolerne i et spil bør være præ-genereret. Dog er det en international standard, at spilleren, i visse spil, kan få lov til at vælge kort fra en stak af præ-genererede kort.

DOGA foreslår, at denne mulighed også gives til danske spiludbydere/spillere.

4) § 15 b, stk. 3 og 4 (3 sekunder og 10 sekunders regel)

Det foreslås, at præsentationen af udtrukne numre eller symboler sker med minimum 3 sekunders interval, og at spillet sættes i bero i minimum 10 sekunder mellem hver gevinstgivende begivenhed.

DOGA skal hertil bemærke, at de foreslåede regler afviger væsentligt fra reguleringen af onlinebingo i andre lande, hvorfor det vil være svært eller umuligt for spiludbydere og danskerne at deltage i internationale puljer på tværs af landegrænser. Så vidt vides er der ikke andre lande, der har regler for, hvor hurtigt spillet skal afvikles eller for, hvor lang tid, der skal gå mellem hver gevinstgivende begivenhed. Ved at sætte unikke regler for den tekniske afvikling pålægges spiludbydere og spiludviklerne administrative omkostninger og forhindrer spiludbydere i at udbyde spil, hvor spillerne i forskellige lande deltager i det samme spil.

DOGA foreslår derfor, at reglen udgår.

5) § 15 b, stk. 5 (køb af spilleplader)

Det foreslås, at køb af spilplader tidligst må kunne foretages 10 minutter før spillets begyndelse.

Hertil skal DOGA bemærke, at det virker unødigt restriktivt at fastsætte en så kort tidsgrænse for deltagelse i spillet. Reglen vil givetvis betyde, at en række danske spillere ikke vil kunne nå at registrere sig, inden for det korte vindue, der gives for at tilmelde sig et spil. Dermed vil omsætningen i spillet ikke nå det niveau, som det burde.

DOGA foreslår, at tidsgrænsen for deltagelse udvides, eller at den helt udgår.

Med venlig hilsen



Morten Rønde
DOGA

DOGA er: bet365, PaddyPowerBetfair, Unibet, Betsson Group, Kindred Group, PokerStars, LeoVegas, Spillehallen.dk og TivoliCasino

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Titel: Consultation - online bingo
Sendt: 10-11-2017 17:19:32

Dear Sirs and Madams,

Kindred (in Denmark operating the brands Unibet and Maria Casino) fundamentally supports the views expressed by the Danish Gambling Authority, and would like to add a few additional pieces of feedback as per the below.

Roll-On Bingo:

Bingo is a game of few winners, 75-ball bingo only has 5 prizes and 90-ball bingo has only 3, and this is regardless of the number of participating players. So even though a game can have hundreds of players and thousands of tickets in play only a limited few are able to win these prizes.

Roll-On Bingo is a prize distribution that offers up to 5 (or more) additional full house/coverall prizes to be won after the standard prizes. Balls continue to be drawn until one, two or more players have also filled their bingo ticket.

These prizes are part of the total game prize pool of that particular round, so instead of distributing the prize pool to 5 prize positions in a 75-ball game, it is shared between 6 – 10 positions) – which means that the winnings are distributed to a larger number of players. This makes the game more enjoyable as it is otherwise very hard to have a winning ticket in bingo.

Scratch cards

In other markets Kindred currently run various time limited promotions where players are asked to wager a required amount in bingo or minigames and in return they receive a reward or a portion of their wages back. The reward can be cash, bonuses, free spins, access to an exclusive bingo rooms or, a more exciting version which is a scratch cards (with or without a guaranteed win).

When scratching the scratch card, a player can win various prizes such as:

- Trips or merchandise
- Cash
- Bingo bonus
- Mini Game Free Spins

2nd Chance Scratch Cards (on which they receive a 2nd chance to win any of the above or nothing)

Kindred would appreciate if this would be possible also for online bingo in Denmark.

Bingo game scheduling (10 sec pause between wins):

A bingo ticket consists of 25 numbers out of 75 in a 75-ball bingo game. In theory a player can fill the ticket within the first 25 ball calls (but statistically this is highly unlikely).

Unlike casino, where players can spin the reels as often as they want, in bingo, players cannot influence the number of games that are being played. The games are scheduled at six minute intervals (on our network) offering ten games an hour per room, regardless of how quickly a single game is completed.

Looking at 479 75-ball games run on one example day – the average number for a full house win was 58 ball calls – ranging from 47 to 64. Each ball is drawn with 3,5 second intervals and with a (current) 3 second pause for each line win – the average game runs for 3 minutes and 35 seconds (slowest: 2 mins and 56 sec to quickest: 3 mins 56 seconds). Leaving an average pause between each bingo game round of 2 minutes 25 seconds.

Increasing the pause between wins have no impact on the number of games run or number of winners in the game, but disrupts the individual game round and customer experience.

Jackpots

Kindred would finally welcome a confirmation that it is allowed for licensed operators to offer pooled liquidity jackpots, i.e. that Danish bingo players can participate in games where the jackpot sum is gathered also from customers in other countries than Denmark.

Many thanks and kind regards,

HENRIK SVENSSON
REGIONAL LEGAL COUNSEL

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Kindred is one of the fastest growing online gambling operators in Europe with industry leading Sportsbook, Casino & Games, Poker and Bingo products. Our purpose is to transform gambling to ensure fair play, the best deal and a great experience for our players. For more information about Kindred Group plc visit www.kindredplc.com

www.kindredplc.com



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Fra: Nina Henningsen (nhe@horten.dk)
Titel: journalnummer 2017-2867 - Bekendtgørelse om ændring af bekendtgørelse om onlinekasino (nye regler om onlinebingo)
Sendt: 10-11-2017 15:53:37

Til rette vedkommende,

På vegne af min klient Playtech fremsender jeg hermed Playtechs bemærkninger til bekendtgørelse om ændring af bekendtgørelse om online kasino (nye regler om onlinebingo):

Playtech er en af de største platformsleverandører indenfor online spil og leverer spil til en væsentlig del af de danske online spil licenshavere.

Bemærkninger :

Playtech understands that the Danish Regulating Authority have liberalised online bingo for the Danish market. As suppliers of Licensed Operators in Denmark, Playtech would like to share with the Danish Regulating Authority the opinions on the Executive Order on the liberalising of online bingo, as elaborated below:

- **Tax: 20% across gross gaming revenue**
 - Online bingo will be added to the licence holder's existing online casino licence and taxed accordingly to this.
 - We agree with this and believe this is a sensible approach to launching this new gaming option.
- **Online bingo will be allowed in 75- and 90- ball game formats.**
 - Bingo cards shall consist of five rows and five columns with 75 numbers or symbols, or three rows and nine columns with 90 numbers or symbols.
 - Whilst we welcome the inclusion of the 75-ball and the 90-ball versions of Bingo, we note the exclusion of the 80-ball version. It is common practice to offer 80-ball Bingo where the card consists of four rows and four columns.

Further, the UK market has no restriction on the number of balls called in a game of bingo, allowing operators and software houses to develop unrestricted variations on the game giving customers maximum choice and variety. Regulation in Spain followed the same approach in 2013 (through Ministerial Order HAP/1998/2013) having previously allowed only 75-ball, 80-ball or 90-ball versions of the game. The Italian Regulator is currently in the process of adopting the same approach. This means that for a large and increasing Regulated marketplace unrestricted bingo formats are the norm.
 - We therefore recommend that no restriction is placed on the format of bingo games available to players in Denmark*
 - The printed numbers or symbols are drawn and called out one at a time.
 - We agree with the proposed process for drawing and calling out numbers one at a time. This is aligned with other international Regulated markets.
 - The player shall have an option to manually mark the printed numbers or symbols at all times.
 - This option will be unique to Denmark and will require specific bespoke development that will have no practical use. Such an option will be frustrated by player connectivity issues and difficult to implement effectively across small hand held devices. We recommend that this rule be removed.
 - The player may not choose the combination of numbers or symbols on the bingo card.
 - We agree the players may not choose the combination of numbers or symbols on the bingo card. The numbers or symbols should be pre-generated, though the player should be allowed to choose a card or cards from the pre-generated cards produced as is the case in other international Regulated markets.
- **Cards made available to players no sooner than 10 minutes before a game starts.**

- The purchase of bingo cards must, with the exception of online bingo provided via television, be possible no earlier than 10 minutes before the game starts.
 - *This rule would be unique to Bingo in Denmark and would single out Bingo as being the only game with a timing restriction. We recommend that this rule be removed.*
- **Numbers or symbols will be called every three seconds, with the game stopped for 10 seconds each time a winner is called.**
- The game shall end when the first board has been completely filled.
 - *We agree with the proposal to end the game once the first board has been completely filled, though multiple winners should be allowed for various options during the game, for example the completing of a line or the four corners etc.*

No other international Regulated market has a rule stating the speed at which numbers are called. This would be unique to Denmark and would make Bingo incompatible with other markets meaning international liquidity would be impossible – the game would not synchronize with games in other markets. We recommend that this rule be removed.

No other international Regulated market has a rule stating the specific length of time a game must be paused once a winner is called.. This would be unique to Denmark and would make Bingo incompatible with other markets meaning international liquidity would be impossible – the game would not synchronize with games in other markets. We recommend that this rule be removed.

- **Players will be restricted to spending a maximum DKK175 per day on bingo cards.**
 - This only applies to online bingo provided via television.
 - There are no limitations to bingos offered via other channels.
 - *We agree with the proposal not to limit bingo offers through the online channel*

Kind Regards,

Caroline Newman



| **Caroline Newman**
Compliance Manager

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Har I spørgsmål eller bemærkninger er I velkommen til at kontakte mig.

Med venlig hilsen

Nina Henningsen
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Vi har modtaget de ændrede bekendtgørelser, hvor det fremgår, at TV Bingo fremadrettet er omfattet af reglerne om onlinebingo.

Indledningsvist skal vi takke for, at der er reageret på de daglige og praktiske udfordringer, som vi har gjort opmærksom på, der lå i de tidligere udkast.

Undtagelse for 20 % afgift

Dog skal vi gøre opmærksom på, at forslaget betyder at der vil fragå idrætten i Aalborg et betydeligt beløb, idet SIFA vil miste indtægter på **halvanden million kroner om året**, som følge af at der skal betales en afgift til SKAT på 20% af bruttospillemåltægten (indtægter fratrasket præmier).

Vi har beregnet, at såfremt SIFA havde været omfattet af regelsættet fra 01.01.2016 ville det have medført et mindre overskud i 2016 på 1,3 mio. dkk og for de første 9 måneder i 2017 et mindre overskud på 1,1 mio.

Dette vil naturligvis påvirke aktivitetsmulighederne for vore idrætsforeninger at Staten nu pludselig skal have dobbelt så meget som de velgørende foreninger.

Til delvis kompensation herfor foreslår vi, at det indarbejdes en undtagelse i bekendtgørelsen, at SIFA ved opgørelsen af bruttospillemåltægten foruden gevinster kan fradrage uddelinger til alle vores 204 medlemsforeninger og over 60.000 medlemmer (alle er idrætsforeninger og godkendt af Aalborg Kommune og naturligvis almenvelgørende foreninger.)

En anden undtagelsesmulighed kunne også være at TV Bingo må fratrække dokumenterede TV-produktionsomkostninger – samt halvdelen af afgiftsgrundlaget.

SIFA har jo i snart 33 år spillet TV Bingo jf. lotteribekendtgørelsen, hvor 35% af omsætningen tilfaldt velgørende formål i SIFA' s foreninger, hvor det ikke mindst har lettet arbejdet for de mange frivillige ildsjæle.

Undtagelse i spilafviklingen

Hvad angår selve spilafviklingen, altså selve tv-udsendelsen, så tager bekendtgørelserne livet af vores traditionelle TV Bingo! Det er slut med at ringe ind og vælge en låge! Netop denne mulighed – mener vi – er essentiel for TV Bingo – og har eksisteret i 33 år! Altså lige pludselig – så er det ikke lovligt at spille et spil – som har været spillet i en hel generation. Hyggen, nostalgien....over and out!

I dag fungerer det med succes således, at de første med bingo kan forsøge at ringe ind til bingostudiet. Alle der ringer har naturligvis godkendt bingo (5 tal på en vandret række) på deres spilleplade med sikret minimumsgevinst og vælger så en bingolåge i bingoreol m. låger, hvor der er forhøjede præmier imellem 300 kr. og op til 5.000 kr. (hvis man finder bingotrolden).

Derfor vil SIFA gerne appellere til og sikre os med en undtagelse, at denne grundmodel med at bingovinderne fortsat afslutningsvis kan ringe ind og få en bingotrold og en forhøjet gevinst. Naturligvis beregnet ud fra den aftalte tilbagebetalingsprocent på max. 45.

Ikrafttrædelse

Tiden nærmer sig jo 1. januar 2018 – og eftersom vi endnu ikke kender de endelige bekendtgørelsers udseende – beder vi – uanset - samtidig om dispensation frem til den 1. september 2018.

Vi kan jo selv sagt ikke gå i gang med at lave ændringer – når vi ikke helt præcist ved, hvad vi skal ændre til – men at det er mange ting, der skal ændres, er der ingen tvivl om.

Nedenstående punkter efterlever SIFA TV Bingo allerede i det væsentligste:

- Værdien af hver enkelt gevinst må ikke overstige 5.000 kr.
- Den samlede salgssum må ikke overstige 100.000 kr.
- Spilleren indsats må ikke overstige 175 kr. pr. dag
- Tilbagebetalingsprocenten må ikke overstige 45.
- Aldersgrænsen minimum 18 år.

Afhængigt af hvordan bekendtgørelsen så endeligt kommer til at se ud, og for ikke at skulle "lappe" for meget på vort gamle tvbingo.dk - skal vi dog have udviklet ny hjemmeside med tilrettede nye funktioner.

Vi skal således have funktioner til oplysning af Cpr, loft for indbetalinger, trykning og udvikling af nye bingoplader og trækninger med gevinstprocenter der lever op til tilbagebetalingskravene.

Derfor vil vort ønske være, at vi kan bede om dispensation på de få punkter der måtte mangle på grund af tidspresset og være endelig færdig og 100 % klar engang i efteråret 2018.

Så passer det forhåbentlig med at vi kan få det hele certificeret ved den årlige inspektion af vor onlinekasinotilladelse ved samme tid.

Med venlig hilsen
SIFA (Samvirkende Idrætsforeninger Aalborg)

Keld Jensen, Formand

Peter Skram, Kontorchef

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Ref: Public consultation on Danish online bingo regulations

Order Number: 773, section 15b

Dear Sir/Madam,

Introduction

I am writing to you in response to the recently published Danish online bingo regulations. Firstly, we absolutely welcome the opportunity that these regulations offer tombola. From the outset of online gambling regulation in Denmark, tombola has always been keen to operate online bingo under license. We have followed the progress and liberalisation of the rules and it is our intention to apply for a casino license and offer online bingo to Danish customers in 2018.

Founded in 2000 tombola is the most recognisable online bingo brand in the UK with more players than any other company. The group is also the leading online bingo company in Spain and Italy with offices in Sunderland, Milan, Madrid and Gibraltar – and has plans to expand into Portugal and Denmark in 2018. Our intention is to open an office in Copenhagen that will support us locally as we develop our Danish operation.

The tombola group has only ever operated where we have obtained a gambling license and we pride ourselves on having strong and transparent relationships with all gambling regulators and the respective tax authorities.

Responsible Gambling Approach

We have a relatively straightforward strategy with a fundamental part of this being our approach to our customers experience with the brand and products. We develop all of our products in-house and this enables us to control price, speed of play, and number of games played as well as amounts players can deposit. Having this control means we can limit the average loss per player per hour. Unlike many other operators we actively work to maintain and reduce this with the belief that players will enjoy the experience they have with us more if we limit their risk to loss.

All of our products are built with average loss per hour at the forefront of our thinking as the game engines and mathematical models are designed. All products must fall within our loss per hour boundaries.

Due to our customer first and responsible gambling approach we consistently win industry wide recognition across all countries. At the this years UK and Italian EGR awards we won both the most Socially Responsible Operator and Bingo Operator of the year awards.

tombola in Denmark

We welcome the opportunity to apply for a casino license in Denmark and the ability to launch online bingo after 1st Jan 2018. We have been keen to see the secondary regulations that will govern how we can operate the bingo product and overall the regulatory landscape appears incredibly sensible and customer friendly. We would however appreciate consideration to be given to clause 1 under section 15b of the proposed regulations:

1) The bingo card must consist of five times five fields and 75 numbers or symbols or three times nine fields and 90 numbers or symbols.

At the root of this request is our genuine belief that this clause will restrict the Danish customers enjoyment of various types of bingo-based products and limit long-term category innovation.

Bingo Regulations in licensed territories

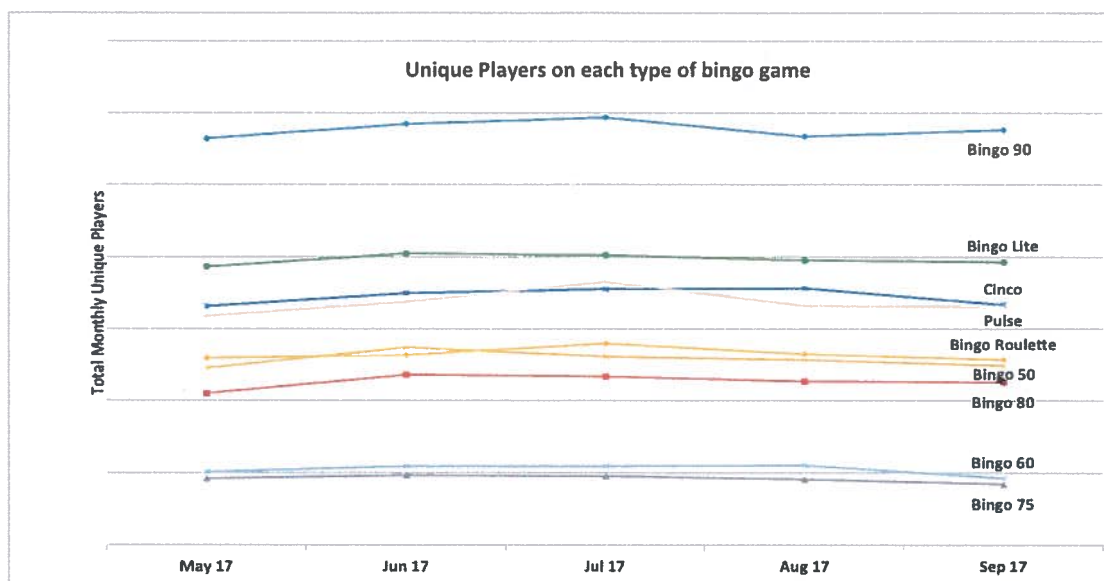
When we compare the proposed Danish online bingo regulations (specifically clause 1 of section 15b) with those of other licensed territories the rationale behind our request to review clause 1 will become apparent.

UK: In the UK we currently offer a variety of bingo-based products. These products are all based on the winning ticket(s) being determined by the drawing of the numbers displayed on that ticket (x) from a total universe of possible numbers (y). So for example, in Bingo 90 a ticket contains 15 numbers on a grid of 3x9 fields (x=15). Once those 15 numbers are drawn from the universe of 90 (y=90) then the ticket is deemed the winner.

The principle of exact numbers from a total universe of numbers is applied to all bingo variants and is the essence of a game of bingo. In bingo 75 the universe is 75 and the number needed to win a line prize is 5.

Some of our most popular games in the UK are Cinco (winning card needs 5 correct numbers from a universe of 52) and Pulse (12 from 36). We also have various other forms of bingo such as 80, 60 and 50 ball (universe) versions. We continue to innovate within the UK regulations and will be releasing a new bingo version in early 2018 called 'Blocks', which are 6 from 60.

For context in this financial year we will have over 500,000 unique customers purchase a ticket across our UK bingo based products and we will pay gambling duty/taxation to the UK Government of +£12m (+100DKK).



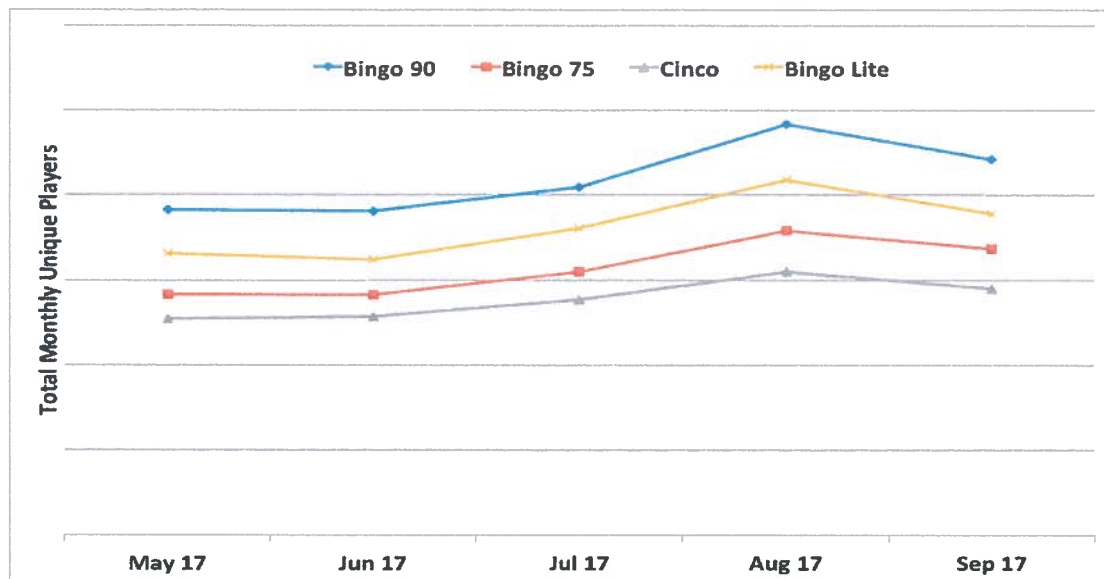
The above chart shows the popularity of tombola's bingo variants. As you can see Bingo90 is the most popular with Bingo75 being the least favoured game.

The UK online bingo regulations allow for any value of 'y' (the total amount of numbers on a ticket needed to win) from any universe of 'x' (the total amount of balls that could be drawn in the game of bingo).

Spain: When online bingo regulations were first introduced in Spain game choice was limited to three variants of bingo – 90, 80 and 75 balls. These are the traditional variants of the game. However after seeing the restrictive nature of this the Spanish regulator adopted a position similar to that of the UK regulator and now allows bingo variants of any universe of numbers. This enabled us to launch Cinco (bingo52) and we will be launching Pulse (bingo36) in the New Year. Allowing us to launch these new and innovative versions of bingo has given our Spanish players much more choice.

In 2013 a new ministerial order (HAP/1998/2013) amends the first regulation eliminating completely the classification of bingo games of the original regulation

"The basic regulation of different types of gaming has been amended, in particular the regulation concerning bingo. Specifically, the definition of bingo has been changed, a control on the signs and symbols used in the game has been introduced **and the list of classes of bingo has been removed for the purposes of eliminating any anti-competition restrictions.**"



Italy: Since online bingo was regulated in Italy games have been limited to the 90-ball version only. This has limited the customer experience and enjoyment to this product and meant we have been limited in our innovation. The Italian regulators understood this from 4 years ago and have been in the process of amending the initial regulation. Due to a number of political changes and bureaucracy, correcting the initially regulations has been difficult for the regulator. However, these changes are now imminent and will align online bingo regulation with that of the UK and Spain.

This is the specific clauses from the new Italian Bingo Decree that will allow innovation and player choice within bingo games:

Having regard to the communication to the President of the Council of Ministers, in accordance with article 17 of Italian Law no. 400 of 1998, delivered in note no.

Adopts

the following regulations

Article 1

Object and definitions

1. This decree lays down the terms governing the management and offering of the Bingo game conducted exclusively through remote participation.
2. Remote bingo is a game involving the progressive drawing of a maximum of 100 elements resulting in the awarding of one or more bingo prizes, with the players using, as their game unit, one or more tickets, on which various elements are displayed, defined by the random number generator.
3. The bingo prize is won when, during a game, by means of the drawing of a numerical series by the RNG and its matching with a series of elements, all the elements present on the ticket are drawn, as indicated in the rules of the game.
4. The awarding of the last prize provided for in the rules of the current game will trigger the conclusion of the gaming session.

The above is very much in-line with the Danish regulations with the exception of point (2). In essence this allows for the 'universe' to be flexible up to a number of 100 and not static or fixed on defined numbers.

Innovation and Player Choice

tombola is the market leader in all our operating territories. This is down to our strategy and unique proposition in the market. We are the online bingo destination of choice for the bingo player and we continue to improve the experience through continuous innovation. We have a clear roadmap of product delivery for Denmark and given the ability this would include delivering new, innovative and fun bingo variants for the Danish market. We believe that offering flexibility within bingo variants will deliver greater satisfaction and fun for the player (in a controlled, responsible and safe environment).

Summary

tombola is committed to entering the Danish online bingo market and we are confident that we will enhance the experience for the Danish bingo player. In order for us to maximise the enjoyment from this experience we ask for consideration to be given to clause 1 of article 15b of the amendments being proposed, namely:

**»Chapter 5 a
Online Bingo**

§ 15 b. When operating online bingo, the following conditions must be met:

1) The bingo card must consist of five times five fields and 75 numbers or symbols or three times nine fields and 90 numbers or symbols.

We believe that it would be in the interests of the Danish market to consider the experiences, changes and flexibility demonstrated in other regulated markets and consider adding further flexibility to the number (universe) range.

We would be more than happy to demonstrate our rationale in person if this would be appropriate and helpful.

Yours sincerely,

Murray Chisholm
Managing Director
tombola International
8th November 17