ON-LINE GAMING FORUM

Crown Towers, Melbourne

ON-LINE GAMING REGULATION: WHAT WE NOW DO, CAN DO AND SHOULD DO

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1. Synopsis

- Background
- Concerns surrounding on-line gaming: realities in the market
- Controls required by the Australian regulators' technical requirements specification
- State of the technology in terms of providing these and other controls: what can and can't be done
- Using technology to promote responsible gaming: big brother or watchful brother.
- Australian standing and leadership in the international regulated gaming environment
- Some personal remarks and conclusions

(While throughout the paper I refer to John Citizen rather than Jane Citizen, this is purely for expedience. I neither suggest nor imply gender bias in any way in the matters discussed.)



2. Who and What is BMM - declaring interests

My name is Hugh Monypenny. I am a Principal and the Managing Director of BMM International.

BMM is a firm of independent consultants that specialises in the definition of technical requirements and in conducting compliance testing of gaming systems. We have been in business since 1981 and have made a major contribution towards the establishment of probably the best-regulated gaming environment in the world.

Within Australia BMM is regarded as the leading, toughest and most experienced Accredited Testing Facility (ATF).

Australia is widely regarded internationally as the showcase and benchmark for player protection, sensible regulation and high technical standards. This is the result of consistent, high quality and principled effort put in over the years by the regulators, the gaming industry and the Accredited Testing Facilities.

Of interest to this Forum is the fact that BMM wrote the Technical Requirements Specifications (TRS) for interactive gaming, variants of which have been adopted by Queensland, Tasmania and Norfolk Island. These TRS are also being considered by other Australasian jurisdictions and by a number of overseas jurisdictions.

That is the end of my commercial.

BMM clearly has an interest in the introduction of Internet gaming regulation, as an ATF able to certify compliance with the Australian TRS. We have already certified compliance of the systems The Federal Group launched in May in Tasmania, and are currently testing other systems that have been in the pipeline since late '99 and early this year.

We are a long-term participant in this industry, and have seen the industry grow and mature into the respected position it has today in the international regulatory community. Our main interest is to ensure that this respected position is maintained. Market realities have to be dealt with in a rational and coherent way, resorting to sound regulatory and engineering practices that are consistent with the fundamental principles of a free and liberal society.



3. Concerns surrounding On-Line Gaming

The advent and phenomenal growth of the Internet has caught Society unawares. A society that prides itself with being liberal, broad-minded, and willing to promote individual choice is suddenly faced with the reality that its citizens probably have too many choices. There are good grounds for questioning whether John Citizen is ready for this. Virtually overnight there is an avalanche of services available to him at the click of a button.

Is he able to make responsible and educated decisions about what is good and bad for him?

On-line gaming is an application which attracts strong critical attention because it is one of the activities which has traditionally been proscribed by society, with good reason in many cases, as a serious trap for the unwary.

But, as anybody who was born post-Vietnam or who has parented teenagers in the last 20 years will attest, western society has for a long time been educating its youngsters to question authority, and to expect rational reasons for regulations imposed by the governments they elect. It is not reasonable to expect that John Citizen will today accept the dictates of regulators without there being a logical, credible and common sense reason for the imposition of such regulations.

Australia is a model of a liberal society, where fair go and equality of opportunity rate extremely high on the political agenda. While we may not have succeeded in all areas, it would be fair to say that we have not done too badly by international standards.

The main, and reasonable, concerns surrounding on-line gaming are the following.

1. It will make it too easy for people who are prone to excessive gambling to get into financial trouble. This can have disastrous results if they have a family that is exposed to the consequences of those excesses. There will be no impediment, such as having to front up to the local pub or club on a wet and windy night, to these vulnerable players gambling beyond their means.
2. It will make gambling available to people who would otherwise not have considered doing it, some of which may develop a problem.
3. In spite of the best endeavours of regulators and Responsible Gaming initiatives, compulsive gamblers may go to extraordinary lengths to circumvent the barriers put up to prevent them from gambling to excess.
4. Governments run the risk of being seen to profit from these excesses, and therefore being viewed as mercenary and uncaring.
5. There is a perceived concern that on-line gaming will open the floodgates to money laundering. This is ill conceived, and I will discuss it further in a minute.

There is therefore a serious and well-founded concern about the effect that the ready availability of on-line gaming facilities may have on the more vulnerable members of our society. The argument that banning it will at least reduce their exposure is reasonable. **But only in the short term.**

Lord Kelvin offered the now widely accepted insight that '**If you cannot measure, you cannot control it**." I think that he would not be upset if we plagiarised his dictum and changed it slightly to say, "**If you cannot regulate it, you cannot control it.**"



4. Controls required by the Australian regulators' technical requirements specification

The Australian Technical Requirements Specifications for interactive gaming were developed during the first half of 1998 to support the regulatory control model then being considered by the state gaming regulators. The intent of the specifications was to outline the technical controls that interactive gaming systems should implement, without being overly prescriptive and thus stifling innovation and being immediately out of date. As stated earlier, these technical specifications have been adopted by a number of Australian regulators. While each regulator has made minor modifications to the original in order to accommodate local conditions, the important requirements remain intact and generally consistent across all jurisdictions.

In broad terms, the specifications require technical controls in the following areas:

- Player protection and responsible gaming.

  A gaming system must implement facilities that allow players

  - to limit how much they spend over a period of time,
  - to exclude themselves or to allow a person close to them to request exclusion,
  - to be able to get detailed reports (including replays) of their gaming activity,
  - to obtain information about problem gambling services, and
  - to easily contact the regulator.

- Proof of Identity.

  The operator must establish with reasonable confidence the identity of the player before allowing him to open an account and play.

- Prohibition on Credit betting.

  The player may only start to play after cleared funds have been deposited in his account. The operator may not, under any circumstances offer the player credit.

- Player Fairness.

  The games in the system must operate fairly, strictly according to the approved rules for the games, and the player must always have access to a clear and concise description of these rules. This requires extensive mathematical and statistical analysis of each game by the ATF.

- Privacy and Security of Information.

  The gaming system must use security technology to guarantee the privacy and security of the information about the player and their gaming activities, maintain detailed audit trails, and have appropriate procedures to ensure that this technology is used properly to achieve the desired result.

- Systems controls, operational issues and reporting.

  There is a range of other measures, tools and procedures that need to be in place to ensure that the operation, upgrading, staffing and physical security of the installation is properly controlled and auditable.

I now address each of these in more detail.



Player Protection and Responsible Gaming

The technical requirements specify that Interactive gaming systems must have a number of technical features to allow players to control their gaming activities.

Firstly, players must be able to set their own expenditure limits so they can control the amount of money they spend per day, week or month. Furthermore, a player cannot increase an expenditure limit without a seven-day cooling off period, whereas a decrease in the expenditure limit must take effect immediately.

Secondly, the system must implement features whereby a player can be excluded from using the site, both through their own actions and through the actions of the operator, given direction from the regulator. Regulators can ban specific players either at the request of the player or of someone affected by the player's habit. The availability of these features must be displayed in a prominent location. A seven-day cooling off period applies before a request for re-instatement is actioned.

Thirdly, the site must provide the player with statements regarding their activity on the site, including replays of previous games, so they can track how much money and time they are spending.

Fourthly, the site must provide the player with contact information for problem gambling services. The existence of this information must be displayed prominently.

Finally, the site must provide information so that players can contact the regulator in relation to any aspect of the site.

While not currently part of the technical requirements, other controls aimed at player protection and responsible gaming are feasible, for example

- forced breaks in play,
- display of the current time of day,
- time spent playing during the current session and
- additional restrictions on the use of particular payment mechanisms.

Proof of Identity.

The regulatory model requires operators to establish a player's real identity with the provider before allowing them to commence gaming.

The intent of this requirement is to prevent under-age gaming and gaming by people who have been banned. It also provides operators with the ability to ban people on the basis of where they live.

There are two parts to this issue. Establishing the link between the real person and the account, and then controlling access into that account. Establishing the link is the difficult part.

The technical specifications require that systems prevent gaming accounts from being activated until such time as the player has provided evidence of their identity, age and place of residence. The level of proof required is similar to the 100-point check required to open a bank account in Australia. Current implementations rely on an operator "enabling" a player's account once they have received documentary evidence via post or facsimile. In order to overcome the difficulties associated with international players, the technical specifications allow the use of third parties to establish their identities, provided that the third party has been appropriately vetted.

Having established the link between the player's identity and the account, the system must implement adequate authentication checks, using strong passwords, each time the player attempts to create a gaming session with the system.



Ideally, the global Public Key Infrastructure will develop to the extent where regulators and operators can have sufficient trust in international digital certificates.

Prohibition on credit betting.

A long-standing player protection mechanism is the prohibition on credit betting. This is primarily aimed at preventing operators from lending money to customers for the purposes of gambling.

The technical requirements require that players only use cleared funds. For credit cards, this means that the system record the authorisation number provided by the financial acquirer. For cheques, this means that the system must only release funds on advice that the cheque has cleared, and must record cheque details for subsequent auditing by the regulator. For manual adjustments to accounts, this means that the system must produce a daily report of all manual adjustments for the regulator to review.

Player Fairness

The technical requirements mandate that the system operates fairly, and that the player be provided with sufficient information so they are fully informed before participating.

The rules of the system and the games must be available to the player. These rules must provide clear explanations of the way the games operate:

- what actions the player can take;
- how the player takes those actions;
- what actions the system will take;
- what constitutes a win, loss or draw; and
- the expected (long-term) return to the player if this cannot be readily determined from the rules.

The regulator considers the rules for each game, and the game is only approved if the rules are fair.

The most critical component in a system with regard to player fairness is the random number generator. The output of the random number generator must be unpredictable, as this is what determines whether a player wins or loses. The technical requirements go into great details of the properties that random number generators must posses before they can be considered to be acceptable.

From a technical perspective, the second most important component with regard to player fairness is the game itself. The mathematical basis of the game must be sound, so that the game behaves exactly as described in the rules. The game must pay on all winning combinations, and not pay on loosing combinations, and the long-term return to player must be the same as that approved and advertised. The game must work correctly irrespective of the bandwidth between the operator and the player, and irrespective of the hardware and software in the end player's PC (or phone, or other widget). In order for the player to make sense of screen behaviour, simulated devices must behave the same as their counterparts in the real world.

Security and Privacy of information



The technical requirements mandate the use of security technology to protect information in transit through the Internet and during storage on the computer system.

Personal information – including financial account and credit card details – must only be transmitted or stored in a strongly encrypted form. Some personal information (eg. PINs) must only be stored in an irreversibly encrypted form. Message authentication codes must be used to protect information – particularly personal information, money transfers, bets and results – from modification during transit. The software must faithfully use and record this information.

Audit trails must be kept so that any changes to stored information can be tracked.

The infrastructure must protect the gaming software and its information from unauthorised external and internal access. This translates to the need for firewalls, network intrusion detection systems, host intrusion detection systems, multiple security zones and infrastructure auditing systems and tools.

The technical requirements mandate that operators have to honour players' entitlements even if a disaster destroys their site. In practice this means that operators must operate a disaster recovery site and store each transaction on that site (appropriately secured) in real time.

However, the above technical requirements only *enable* information to be sent and stored securely. Good policies and strong procedures are required to ensure that

- only the appropriate people become authorised to access the data,
- hardware and software continues to be upgraded in light of incidents,
- audits occur on a regular basis, and
- the information be used within the appropriate privacy framework.

Systems controls, operational issues and reporting

Beyond the controls that are immediately observable to players, the technical requirements mandate other controls to protect against errors and fraud. These are:

- software version and development controls to ensure the overall quality of the application;
- transaction logs to enable forensic analysis of any problems that do occur;
- confirmation of results and large wins;
- audit trails of all actions taken by staff;
- suitable qualifications of staff; and
- physical security of the computer facility.

Money laundering

Given everything I have described in this section, clearly an Internet gaming site is the last place in the world you would choose if you wanted to engage in some money laundering. Every transaction is recorded and stored so that all the activity surrounding an account can be reproduced in minute detail. It is unlikely that you would find a system or environment anywhere that is more monitored, checked, audited and controlled. Unlike its land-based counterpart, there is no anonymity about Internet gaming.



Need for such stringent Technical Requirements Specifications

The question is often raised as to why gaming systems are required to meet such high standards when similar standards are not required of banking systems. There are a number of answers to these questions, including the following:

- If the public were acquainted with the lack of rigour in the testing and acceptance of some banking systems, they would have serious reservations about trusting them with their hard-earned money.
- Bank users are generally able to reproduce from their own records a reasonably documented trail of their transactions to check that a bank's record of their accounts is correct. This is not likely to be the case for gaming sessions. There is therefore a much larger element of trust implicit when dealing with gaming operators.
- Though credit card and related types of fraud are allegedly rampant, banking systems are not specifically designed to give the customer the illusion that a fortune lies waiting just around the corner. Therefore the average only slightly "bent" bank user is unlikely to be expecting to find chinks in the banks system which he can exploit to create a shortcut to such riches.



5. State of technology: what can and can't be done to control the Internet

A vanilla flavoured Internet is an insecure and extremely hostile environment. A system operating on it, offering a meaningful service without even minimal levels of protection stands a very high chance of being attacked and seriously impaired, if not destroyed.

One of the original design objectives of the Internet was to develop a network that was highly resilient, scalable, and capable of resisting and working around attempts at preventing messages from reaching their destination. The original architects did a fantastic job. It is now extremely difficult to regulate and control it in the traditional sense of applying restrictions and constraints on who and what is available through it. The Internet Protocol suite (the basic enabling technology for the Internet) treats any form of control (eg. censorship) as a network fault and routes information around the problem.

Soon the Internet will be available to everybody at home, on the phone, on the train, bus or plane, everywhere. We will use it as a matter of course, just like today we use the telephone. If we want to find out anything, from what is the weather going to be like tomorrow to what was the outcome of the debate this morning at the European Parliament on protecting the local dairy industry, we will just ask the Internet, or whatever its successor is. The community will be vitally interested and fairly vocal in having its say on the limits to which Internet peddlers should go. Individuals will want to have the option to screen out that in which they are not interested, but they will want to exercise that choice themselves. They will be prepared to accept that something is harmful if done in excess, and that reasonable constraints should be placed on a service, commensurate with what current research and common sense dictates.

This is what regulation is about, and this is what prohibition forfeits.

The technical standards required of interactive gaming systems submitted for approval by Australian jurisdictions today provide player protection and operator probity way beyond anything required in the remainder of the global interactive gaming market. Players are able to set their own limits, to exclude themselves or allow related people to exclude them, monitor what they are spending, and generally keep a very tight control over how much they spend. If a player refuses to avail himself of these self-control devices, he is akin to the pedestrian who insists on jaywalking or crossing only when the little red man is flashing.

The 100-points approach to identifying people opening accounts is not foolproof, but it will ensure that the vast majority of registrations are fair dinkum. Random checks and limited police follow-up will ensure that most transgressors are brought to account. In a global Internet market this is a bit more difficult, but it would not stretch the resources of law enforcement agencies too much if agreement were reached to provide a global identity verification service through the cooperative efforts of these agencies.

What **cannot** be done today without imposing draconian measures that are unconscionable in a liberal democratic society, is to bar people from accessing unregulated offshore gaming sites. These draconian measures would include requiring ISPs to monitor and restrict the sites to which their customers have access, and to require credit card providers to refuse to accept payment requests from specified sites. Apart from the civil liberties implications, both these measures would be extremely onerous to apply, and very unreliable in their accuracy. The ISPs and credit card providers would be constantly at serious risk of unwittingly breaching the constraints.

6. Using technology to promote responsible gaming: big brother or watchful brother

From the consumer's point of view, gaming is a pass-time that is pursued largely for one or both of two extreme reasons: to make a mint, or to have a good time. Both extremes are probably unrealistic, though I am inclined to think that there are more players close to the "good time" end of the spectrum than to the other.

The average player will want to personally decide when he has had enough. Most people behave responsibly when it comes to making decisions about what they can and cannot afford.

We are fortunate that we now have the technology to assist people with a problem, to contain excesses that are likely to get them into trouble. Other than the dollar cost, there is nothing to stop us putting speed cameras every 500 metres on the highway and to flash up a message either on electronic billboards or on the car's instrument panel that says "Mr Jones, you are travelling too fast. Slow down or you will be fined." We can do the same with gaming and a number of other social activities which, when indulged in excess can lead to problems.

God forbid that we should get to the point where John Citizen will constantly push the boundaries until he gets a message from Big Brother to tell him that he has overstepped the mark.

But a Watchful Brother approach can be taken to alert those playing close to their limits and bring them gently back out of the danger zone.

First of all, no one should be allowed to register on an Internet gaming site without being issued with a clearly worded message that states the obvious. **"This site is a commercial operation which relies on the fact that the amount lost by patrons is greater than that which is won".** In other words **"we invite you to enjoy the entertainment experience we have prepared for you, but if you are coming here to make your fortune, forget it!"** John Citizen will accept that.

Once the player is on his way, and if the operator is true to its promise to provide the customer with an entertainment experience, the player will enjoy himself. Once in a while the player will walk away with more money than when he arrived. But in either case he will be happy if the entertainment value is there.

This is where technology can step in to ensure that this is the case. The average John Citizen will have a pretty good idea of how much he can afford to spend on entertainment. If he is honest about describing accurately his realistic profile to the operator, then the operator's central monitoring system, the Watchful Brother, will have no problems advising the player when he has exceeded the limits he prescribed.

The next level of sophistication is for the CMS to sidestep what the player prescribed personally and go directly to the player's bank and his employer's records to surmise how much he is safely able to gamble. This, the Big Brother approach, would be way beyond the pale in our society.

There will always be players who kid themselves by providing the CMS with safety-net limits that are well beyond their means. But then, there will also always be the drivers who insist on exceeding the speed limit, and the day-traders who will grossly over-gear to acquire that hot packet of high risk stock which proceeds to plummet into oblivion the next day.

There is only so much that the government can and should do to protect people from their own irresponsible actions.

7. Australian standing and leadership in the international regulated gaming environment

It has been widely acknowledged for some time now that Australia is currently the undisputed world leader in the area of Internet gaming regulation. This reputation is well deserved because state regulators have done an excellent job developing a model on which most state governments agreed. Not all states have decided to proceed with regulating Internet gaming yet, and some have no intention of doing so in the foreseeable future. However, the world perceives rightly that Australia is tackling Internet gaming regulation in a mature and intelligent way.

Initially at least, the big brand names wanting to get into Internet gaming will be looking for strong and credible regulatory environments lest going elsewhere might sully their name.

Australia is therefore clearly in a very strong position to take the leading role internationally. But it will not retain it for long. Other credible jurisdictions are moving very quickly to close the gap, and are likely to do so within the next 12 months.

We are moving inexorably toward some form of globalisation. Its precise shape has yet to be determined as there are still very serious issues to be addressed to ensure that, in so doing, we don't leave 70% of the world population stranded in a backwater. Gaming is, and will continue to be, just one of the many leisure services and activities available through this global delivery medium, and it will probably never be the highest rating, but it will be important.

It would be a gross understatement to say that it would be a pity to waste the opportunity of Australia being and remaining the world leader in gaming regulation. We have wasted a number of such opportunities over the past 100 years. Are we setting ourselves up to drop the ball again?

As Internet gaming is the purest form of e-commerce, being the leader will also place Australia at the forefront of developing, establishing and operating very high quality, industrial strength and secure e-commerce systems.

Finally, and perhaps most importantly, if Australia, with its established expertise and experience in this area, does not offer its citizens well regulated and safe Internet gaming facilities, those citizens wishing to gamble on-line will have to go to overseas, and possibly less safe operators. Surely this is not what the Federal Government wants.

This is a real opportunity for Australia, through its State regulators and Federal Government, to take a real leadership role, particularly at the Executive level working with the Industry, in an area in which other major jurisdictions will listen to and recognise our contribution. Australia is the only credible jurisdiction that has to date tackled the problem head on. We now have the capacity to take this to a greater level of sophistication and to offer practical solutions that will address the real concerns of other governments.

8. Some final personal comments

I am not passing judgement on whether IG is good or bad, nor commenting on the potential social consequences of having a large number of individuals holed up at home, on their own, gambling. I agree that this outcome would be undesirable. However, I am inclined to think that it is unlikely to happen because we are basically gregarious animals. This is the reason why cinemas didn't all go out of business when VCRs and videos flooded the market. But I will defer to convincing expert opinion.

The inescapable reality is that Internet gaming is here to stay. To ban it, or to ban anything on the Internet for that matter, will require the imposition of draconian measures that would be unacceptable in 21st century Australia. People will normally choose to do or not do things because they either want to or do not want to do them. They do not look to the government for sanction.

Technology, like tax evasion, is infinitely resourceful and will almost always come up with a way of overcoming an impediment that stands in the way of achieving some desired objective.

When Charles H Duell, then Commissioner of the US Patents Office, stated in 1899 that "Everything that can be has been invented " he was out by many orders of magnitude. At the start of the 21st century we double our scientific knowledge about ourselves and about the universe around us approximately once every 20 years. We achieve this largely by constantly breaking through barriers through the development and application of new technologies. Our constant and incessant drive is to improve our lifestyle options, our independence and our ability to enjoy the benefits of living in an affluent liberal democratic society. To claim that government can apply artificial barriers around what John Citizen can and cannot do in such an environment, given that he is not harming or preventing his fellow Citizens from doing what they want, and that he is not a burden on society, is no longer sustainable.

Gambling has caused problems in societies throughout the ages, as have drugs, alcohol, prostitution, blind ambition and even political greed. Societies throughout the ages have often tried to control and contain these problems through repressive and authoritarian practices. They have done this for limited periods, only to find that John Citizen can only be pushed so far before his desire for freedom of choice within reasonable bounds leads inevitably to him eventually casting off these shackles.

The classic example of prohibition going wrong was the banning of alcohol in the USA early last century. The public still wanted the booze so the criminal element catered for it and established a power base that has remained for years.

If western culture learnt nothing else in the 20th century, it was that **prohibition just does not work**.

I am not suggesting for a minute that on-line gaming is in the same league. But what is happening in Australia today at the Federal level with regard to Internet gaming regulation, or rather the expressed preference to ban Internet gaming, has all the hallmarks of an illogical approach to addressing an inescapable reality. It is a relatively simple problem.

You either do something positive about regulating Internet gaming or you relinquish control to the "dark side" and let John Citizen fend for himself.

It is also an inescapable fact that the tremendous speed at which technology and science are advancing is severely taxing society's ability to cope with the pace of change. Witness the monumental dilemmas that genetic engineering is posing. Surely we wouldn't for a moment suggest that, because, as a society we are not ready to handle these advances, we should place a ban on scientific research? No, we deal with it by fostering discussion, setting up ethics committees



populated with scientists, ethicists, philosophers and community members to thrash out the issues and to provide the community and government with guidance and advice on how to deal with these difficult issues.

A far more important issue than whether or not to allow on-line gambling is how we equip the next generation to handle the enormous paradigm change which is occurring with the advent of e-commerce and the wired society. In the space of less than half a generation there has been an increase of several orders of magnitude in the services and information available on-line. Learning to discriminate between good and bad television was bad enough. Doing so in the infinitely more sophisticated and on-line world will be far more challenging. **This is the problem we need to address**.

Why is it that Las Vegas has changed its whole thrust? It has moved decidedly from being the place were you came to make your fortune and to hob-knob briefly with the seedier side of society, to a theme park atmosphere aimed at family entertainment where gambling is almost incidental. It has done so because the vast majority of people just want to have a bit of fun, to be entertained and to risk a controlled amount of money in the remote expectation that they might win "big time".

The gaming scene in Australia is very different from the Las Vegas model. Whereas the average American will admit to gambling perhaps 12 times a year, the average gambling Aussie which frequents pubs and clubs crowded with pokies would probably tip the scales at the one to two hundred mark. But this is the reality with which we have to deal, and we do not deal with it by simply saying **"You are not allowed to do it!"**

Governments should fearlessly protect their constituents from unscrupulous behaviour by business and other members of society. But how far should governments go in protecting individuals from themselves?

I don't know whether having a moratorium will help the debate. Purely from the business point of view I see two consequences.

1. The current licence holders have an enormous, I dare say unfair, advantage.
2. It will buy time for other jurisdictions to catch up with Australia.

If we are to have this moratorium, so be it, but let us use the time wisely to establish an even better and stronger regulatory framework that will truly protect Australians and get rid of the anomalies that have already crept into the current state-based framework.

In ten years time people will look back in amazement and wonder what all the fuss was about. Let us deal with the potential problems today, and not leave them for the next generation to handle.

Accredited Testing Facilities play an important part in gaming regulation. I am a Principal in the leading ATF in Australia. I will feel extremely embarrassed if my children accuse me in 10 or 20 years time of not having done my best today to deal with a relatively simple problem, choosing instead to pass on to them a **real** problem, 10 times the size.