

Hi Terry,

We have reviewed your proposed special conditions and overall it looks as though you have taken a sensible approach and have come up with a good proposal to protect consumers without introducing too much additional friction.

Our main points for you to consider are as follows, in no particular order:

Question 12

Just to note that it is a requirement of the Gambling Commission that customer care must be handled by the ELM.

SOL8 (d) could therefore be amended to 'customer care services details **of ELM**;

Question 9

Yes, SOL7 gives consumers awareness.

Under Gambling Commission rules, only the ELM is allowed to generate a ticket and enter the user into a draw. As a point of clarity, the aggregator is only sending information from the ticket, rather than generating it.

Question 7: Yes, the list in SOL3 feels like the right information to give consumers.

Our two points are as follows:

1) SOL3 should be updated to mention that links are an acceptable way to include lengthier details on the promotional material. This is compatible with the Gambling Commissions requirement for 'easily accessible'. In the interests of space, it should not be a requirement to include all of these details directly on the promotional material.

2) Might it make more sense for this point to simply say that Society Lotteries must match the promotional requirements of the Gambling Commission, plus any additional PSA requirements? The problem with including a list which is largely already covered by the Gambling Commission will mean that the two lists would need to be kept in sync should the Gambling Commission change their requirements at a future date.

Please let us know if you'd like to discuss these points further.

Best wishes,

Simon

Simon King

Head of Product Development

Online: www.openmobileglobal.com/