

From: s47F
To: [Windeyer, Richard](#); s47F
Cc: [Sullivan, Pauline](#); [Carlon, Adam](#)
Subject: Re: Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]
Date: Thursday, 13 July 2023 6:54:57 PM
Attachments: [image001.png](#)


Thanks Richard,

Will do.

s47F

Get [Outlook for iOS](#)

s22(1)(a)(ii)



Pages 2 to 28 have been removed under sections 22(1)(a)(ii), 45, 47(1)(b) and 47F of the *FOI Act 1982*

From: s47F
To: [Windeyer, Richard](#)
Cc: s47F; [Sullivan, Pauline](#); s47F; [Carlton, Adam](#); s47F
Subject: RE: Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]
Date: Tuesday, 25 July 2023 4:36:01 PM
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image001.jpg](#)
[image005.jpg](#)

Dear Richard

Thank you for your earlier email to s47F requesting further information in relation to online gambling advertising. Thank you also for your patience in awaiting our reply.

We have set out responses to your queries in the table below.

s47C



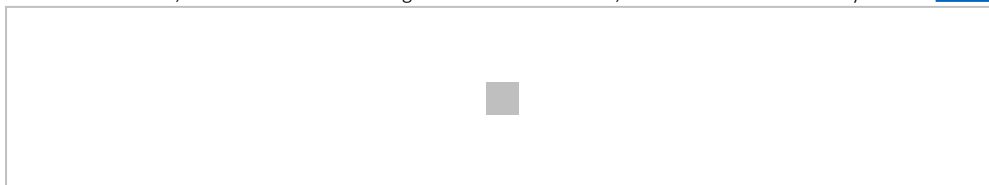
Thank you again for consulting with us. Please be in touch if we can provide further information.

Regards



s47F
 s47F
 s47F [@sbs.com.au](mailto:sbs.com.au)
 SBS 14 Herbert Street
 Artarmon NSW 2064 Australia
 T: s47F
 sbs.com.au

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INFORMATION REQUESTED BY DEPARTMENT

For television broadcasters, the relevant components of the recommendation are as follows:

Phase 1 — Removal of exemption for advertising online gambling during news & current affairs broadcasts

Phase 2 — Prohibition of all online gambling advertising and commentary on odds, during and an

hour either side of a sports broadcast

Phase 3 — Prohibition of all broadcast online gambling advertising between the hours of 6.00am and 10.00pm.

Phase 4 — by the end of year three, prohibition on all online gambling advertising.

s47C

s47(1)(b)



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Pages 31 to 32 have been removed under sections 47(1)(b) and 47C of the *FOI Act 1982*

s47C

s47(1)(b)

From: s47F @sbs.com.au>
Sent: Tuesday, 18 July 2023 4:29 PM
To: Windeyer, Richard <Richard.Windeyer@communications.gov.au>; s47F @sbs.com.au>
Cc: Sullivan, Pauline <Pauline.Sullivan@communications.gov.au>; Carlon, Adam <adam.carlon@infrastructure.gov.au>; s47F @sbs.com.au>; s47F @sbs.com.au>
Subject: RE: Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

Hi Richard

Just flagging that we're working through this request and are applying best endeavours to meet the timeline but due to some senior absences, we might need until the beginning of next week to get you a fulsome answer. I hope this doesn't cause too much inconvenience at your end – happy to discuss as needed.

I think s47F has offered this already but if it would assist we can also provide the Dept with an in person briefing with our Media Sales Director to discuss some of the nuances with the category (including the premium pricing etc).

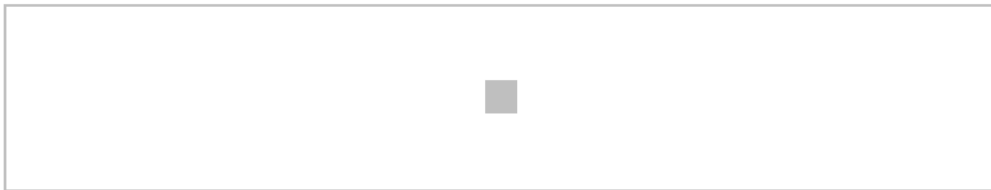
Kind regards

s47F



s47F
s47F
s47F [@sbs.com.au](mailto:s47F@sbs.com.au)
SBS 14 Herbert Street
Artarmon NSW 2064 Australia
M: s47F T: s47F
sbs.com.au

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We are committed to providing accessible and inclusive ways of working, including to enable everyone to participate fully. If I can make some adjustments to the ways, or platforms on which we engage, please let me know.

s22(1)(a)(ii)



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Pages 35 to 43 have been removed under sections 22(1)(a)(ii), 45 and 47(1)(b) of the *FOI Act 1982*

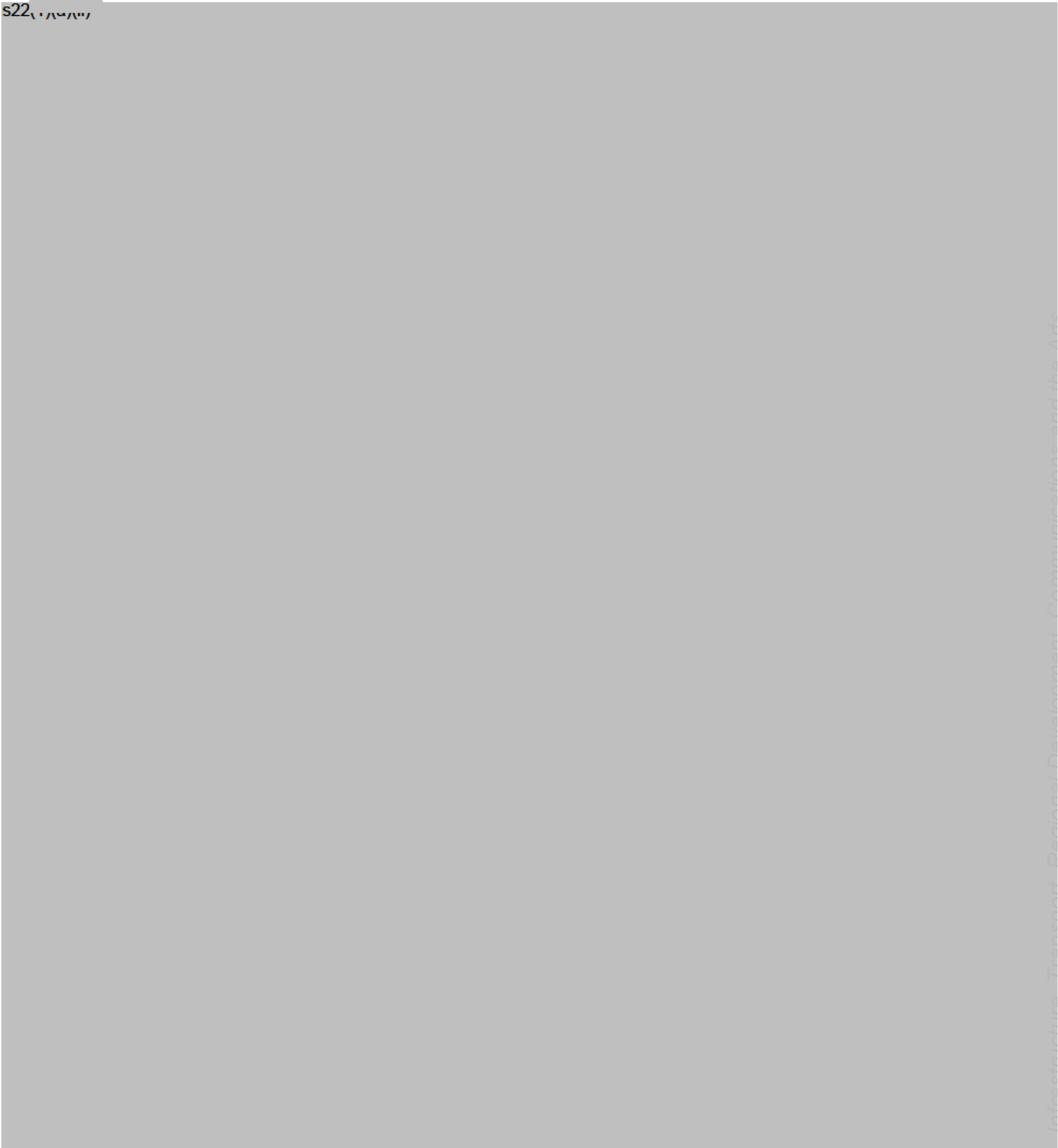
From: s47F
To: s22(1)(a)(ii)
Subject: RE: [EXTERNAL] Information Request - Online Gambling Inquiry - Response due by midday 4 August 2023
[SEC=OFFICIAL]
Date: Monday, 31 July 2023 8:51:48 PM
Attachments: [image001.png](#)

Hi s22(1)(a)(ii)

Just letting you know that s47F last name is s47F. I have sent to him but you may receive a bounce back due to spelling.

Kind regards

s47F
s22(1)(a)(ii)



Infrastructure, Transport, Regional Development, Communications and the Arts

Pages 45 to 58 have been removed under sections 22(1)(a)(ii) and 47(1)(b) of the *FOI Act 1982*

From: s47F
To: s22(1)(a)(ii)
Cc: s47F; [Carlton, Adam](#); s22(1)(a)(ii) s22(1)(a)(ii)
Subject: RE: [EXTERNAL] Information Request - Online Gambling Inquiry - Response due by midday 4 August 2023 [SEC=OFFICIAL]
Date: Friday, 4 August 2023 10:14:59 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Dear s22(1)(a)(ii)

Thank you for your quick reply.

We will be sure to get the relevant information to you by COB Tuesday.

Kind regards,

s47F



s47F
 s47F
 T +s47F M +s47F
 5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



This email is confidential and may be subject to legal or other professional privilege.

s22(1)(a)(ii)

s22(1)(a)(ii)

OFFICIAL

From: s47F [redacted] <[\[redacted\]@foxtel.com.au](mailto:[redacted]@foxtel.com.au)>
Sent: Friday, 4 August 2023 6:38 AM
To: s22(1)(a)(ii) [redacted] <[\[redacted\]@INFRASTRUCTURE.gov.au](mailto:[redacted]@INFRASTRUCTURE.gov.au)>
Cc: s47F [redacted] <[\[redacted\]@foxtel.com.au](mailto:[redacted]@foxtel.com.au)>; Carlon, Adam
 <adam.carlon@infrastructure.gov.au>; s22(1)(a)(ii) [redacted]
 <[\[redacted\]@INFRASTRUCTURE.gov.au](mailto:[redacted]@INFRASTRUCTURE.gov.au)>; s22(1)(a)(ii) [redacted]
 [redacted] <[\[redacted\]@infrastructure.gov.au](mailto:[redacted]@infrastructure.gov.au)>

Subject: RE: [EXTERNAL] Information Request - Online Gambling Inquiry - Response due by midday 4 August 2023 [SEC=OFFICIAL]

Dear s22(1)(a)(ii) [redacted]

We refer to the Department's request for additional information from the Foxtel Group to inform the Government's consideration of the House of Representatives Standing Committee on

Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

The Foxtel Group welcomes the opportunity to inform the Department's policy advice to Government. However, it would be appreciated if the Department could please grant the Foxtel Group a short extension until COB Tuesday 8 August 2023 to collate the relevant information.

We look forward to your response.

Kind regards,

s47F



s47F

s47F

T S47F

M +s47F

5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



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s22(1)(a)(ii)



Pages 62 to 65 have been removed under sections 22(1)(a)(ii) and 47(1)(b) of the *FOI Act 1982*

s22(1)(a)(ii)

OFFICIAL

From: s47F [redacted] <[\[redacted\]@foxtel.com.au](mailto:[redacted]@foxtel.com.au)>
Sent: Friday, 4 August 2023 6:38 AM
To: s22(1)(a)(ii) [redacted] <[\[redacted\]@INFRASTRUCTURE.gov.au](mailto:[redacted]@INFRASTRUCTURE.gov.au)>
Cc: s47F [redacted] <[\[redacted\]@foxtel.com.au](mailto:[redacted]@foxtel.com.au)>; Carlon, Adam
 <adam.carlon@infrastructure.gov.au>; s22(1)(a)(ii) [redacted]
 [redacted] <[\[redacted\]@INFRASTRUCTURE.gov.au](mailto:[redacted]@INFRASTRUCTURE.gov.au)>; s22(1)(a)(ii) [redacted]
 [redacted] <[\[redacted\]@infrastructure.gov.au](mailto:[redacted]@infrastructure.gov.au)>

Subject: RE: [EXTERNAL] Information Request - Online Gambling Inquiry - Response due by midday 4 August 2023 [SEC=OFFICIAL]

Dear s22(1)(a)(ii) [redacted]

We refer to the Department's request for additional information from the Foxtel Group to inform the Government's consideration of the House of Representatives Standing Committee on

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Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

The Foxtel Group welcomes the opportunity to inform the Department's policy advice to Government. However, it would be appreciated if the Department could please grant the Foxtel Group a short extension until COB Tuesday 8 August 2023 to collate the relevant information.

We look forward to your response.

Kind regards,

s47F



s47F

s47F

T S47F

M S47F

5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



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s22(1)(a)(ii)

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Pages 68 to 75 have been removed under sections 22(1)(a)(ii) and 47(1)(b) of the *FOI Act 1982*

From: s47F
To: [Windeyer, Richard](#); s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F
Subject: Information request – Gambling Advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Date: Thursday, 5 October 2023 4:16:20 PM
Attachments: [OppbW0i7kecJg4orB.png](#)
[HyZMFyMK70vnixqN.png](#)
[image001.png](#)
[Deleted mg_info.txt](#)

Hi Richard & s22(1)(a)(ii)

Thank you for contacting ANRA in regard to Gambling Advertising as this topic is of importance to our Racing and Gambling channel members.

s47C

I will also forward your email to the Racing Channels and other narrowcasters who showed an interest in this topic to clarify their views on your email below.

Once I have their responses I will forward them to you.

As with all topics,] we encourage our members, if they so wish, to submit their own views as the Narrowcast sector is so diverse.

Below is a link to a short video on Narrowcast Radio in Australia.

Regards s47F

AN ANRA



Introducing Narrowcast Radio (3 minutes)

Click on the image below to view the video, or go to <https://www.anra.org.au/>



This video explains what Narrowcast Radio is and highlights the important role it plays in Australia's media landscape.

Narrowcast Radio was launched in 1992 and has grown into a mature and diverse industry.

The Australian Narrowcast Radio Association (ANRA) is the sector body which advocates for Narrowcast licensees, including to the Australian Communications and Media Authority (ACMA) who have recently recognized the importance of Narrowcasting by approving the longest 'Drop Through Determination' for low power Narrowcast services since their inception...giving access to spectrum until 2035.

This has given Narrowcasters confidence to invest further in developing their services.

ANRA is currently seeking to achieve modernisation of the regulatory framework which is currently very onerous and time-consuming for both Regulators and Operators.

Initial discussions focus on Procedures at the Administrative/Implementation level, with later topics to be discussed as per the current ACMA Five Year Spectrum Outlook Consultation Plan.

To learn more about Narrowcast Radio, watch the video or visit ANRA's website <https://www.anra.org.au/>

s22(1)(a)(ii)

Pages 78 to 79 have been removed under sections 22(1)(a)(ii) of the *FOI Act 1982*

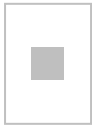
From: s47(1)(b)
To: [Windeyer, Richard](#)
Cc: [Lopez, Margaret](#)
Subject: RE: [EXTERNAL] Information request – gambling advertising – for response by COB 20 October 2023
 [SEC=OFFICIAL]
Date: Thursday, 5 October 2023 12:21:46 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[image008.png](#)

Hi s47(1)(b)

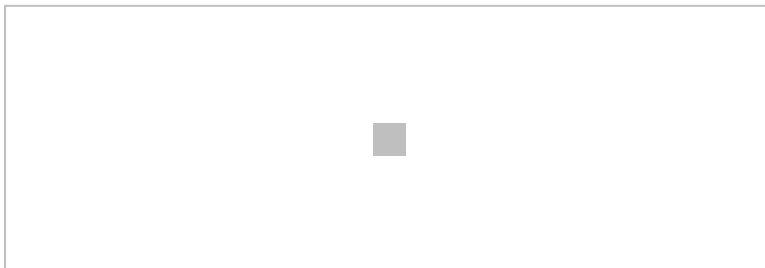
Thanks for your email – just noting the spelling of s47F

Kind regards

s47(1)(b)



s47(1)(b)
 Chief General Counsel & Executive Director of Regulatory
 M s47(1)(b)
 5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



s22(1)(a)(ii)

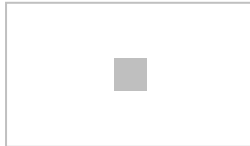
Pages 81 to 82 have been removed under sections 22(1)(a)(ii) of the *FOI Act 1982*

From: s47F
To: [Windeyer, Richard](#); s47F
Cc: [Lopez, Margaret](#); s47F; s47F
Subject: RE: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Date: Thursday, 5 October 2023 12:08:30 PM
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)

Thanks Richard – confirming receipt, and we'll come back to Margaret with any questions that arise as we work through the request.

Kind regards

s47F



s47F

Director, Corporate Affairs

s47F [@sbs.com.au](mailto:s47F@sbs.com.au)

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Artarmon NSW 2064 Australia

M: s47F T: s47F

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s22(1)(a)(ii)



Pages 84 to 86 have been removed under sections 22(1)(a)(ii) of the *FOI Act 1982*

OFFICIAL

From: §47F <§47F@anra.org.au>
Sent: Thursday, 5 October 2023 4:24 PM
To: Windeyer, Richard <Richard.Windeyer@communications.gov.au>; §22(1)(a)(ii) <§22(1)(a)(ii)@communications.gov.au>
Subject: ANRA RESPONSE 18/09/23 TO DITRDC -- ONLINE GAMBLING ADVERTISING RESTRICTIONS

Hi Richard & §22(1)(a)(ii)

As discussed in previous email below is a copy of ANRA's response that we recently emailed to §22(1)(a)(ii)

Regards §47F

AN ANRA

 Hi §22(1)(a)(ii),

Apologies that ANRA's response has taken longer than expected. As you would realise, this matter involves a range of varying opinions from our Membership.

To seek relevant feedback from our members ANRA posed six questions in regard to the proposed Online Gambling Advertising Restrictions.

We undertook this research to assist the Minister's Office, DITRDC and ACMA to gain a clearer understanding the views of our members.

We found that even amongst those operators who are involved in Racing & Sporting events/broadcasting there are differing views regarding online gambling on their services.

As far as operators of other services (eg, religious, ethnic, tourist, music genres, etc) most are not concerned and there would be little impact on their services or income; with some not wishing to comment.

Whereas some operators in regional/remote areas where, on certain days or on special occasions (including special events licences), their format does include racing and sporting content advised that they would be impacted. These operators want to be able to continue to offer this content for their listeners and rely on the income it brings to support their services.

There was general support for Recommendation 26 S-5.149... "Gambling advertising on dedicated racing channels or programs should be exempt from the ban". However there were varying opinions on what constituted a "dedicated" racing channel. The figure of 75-80% of content being racing content seemed appropriate to most...and one comment was offered "a channel whose programming and persona is dominated by racing coverage".

Most respondents supported Recommendation 26 S-5.150 with the amended wording..."Small community radio broadcasts on narrowcast and narrowband services should be exempt from further restrictions until December 2025". Again, there needs to be clarification on what constitutes a "small community" eg, specific licence area population/etc.

In summary, ANRA does not oppose a ban on gambling advertising on radio excluding dedicated racing channels and/or narrowcast or narrowband racing channels.

Note: Our comments reflect a consensus of our membership. However individual members may make their own submissions.

Responses from some of our **Non-Racing members** are summarised below:

Q1...Does your organisation operate a service with a Racing/Sport format? If so, what is the name of the service(s) and what percentage of on-air time is dedicated to racing/sporting content? What content makes up the remainder of your programming when racing/sport is not broadcast (eg, music/talk-back/advertising/ etc)?

16 responses -- 15 do not operate a service with a Racing/Sport format -- 1 does have some Racing/Sport content.

Q2...Irrespective of your format, does your organisation run any gambling/wagering advertising on your Narrowcast radio service?

16 responses -- 14 do not run any gambling/wagering advertising -- 1 does.

Q3...How much do you believe your service would be affected by the proposed restrictions (the Parliamentary Committee's recommendations are at the bottom of this email)? What impacts would the restrictions have on your operations/revenue stream?

16 responses -- 15 would not be affected by advertising restrictions -- 1 would be greatly impacted.

Q4...ANRA's early sense is to support Recommendation 26 S-5.149... "Gambling advertising on dedicated racing channels or programs should be exempt from the ban". Do you agree/any comment?

16 responses -- 14 agree with exempting dedicated racing channels/programs from the ban -- 2 support a total ban on gambling advertising on radio.

Q5...What do you feel the definition of a "dedicated racing channel" might be? For example... Predominantly racing content, a specific percentage (75%) of racing content, etc.


16 responses -- 8 feel that a minimum 75% would be appropriate -- 3 feel that a minimum 90% would

be appropriate -- 4 had no comment. One suggested the wording... "a channel whose programming and persona is dominated by racing coverage".

Q6...In regard to Recommendation 26 S-5.150... "Small community radio broadcasts should be exempt from further restrictions until December 2025"... ANRA believes this needs clarification along the lines of "Radio broadcasts in small communities should be exempt from further restrictions until December 2025". But, more specifically, it would be good to have "Narrowcast Radio" included in this clause. Do you agree/any comment?

16 responses -- 12 agreed with the clarification suggested by ANRA that "Narrowcast Radio" be included -- 4 had no comment.

s22(1)(a)(ii)



Regards, s47F

--

AN ANRA



Pages 90 to 102 have been removed under sections 22(1)(a)(ii), 47(1)(b), 47F of the *FOI Act 1982*

From: s47F
To: [Windeyer, Richard](#); s22(1)(a)(ii)
Cc: s47F
Subject: Information request – Gambling Advertising
Date: Thursday, 26 October 2023 2:45:35 PM
Attachments: [image001.png](#)

Hi Richard s22(1)(a)(ii)

Thank you for the opportunity to submit a response on behalf of ANRA.

As previously stated Narrowcasting is diverse sector, not only in content but also in types of operations...from large corporate services to small local operators, to large non-for-profit organisations.

Click here to view short video on [Narrowcast Radio & ANRA](#)

When it comes to the question of Gambling Advertising, it is of main concern to those operators whose services provide Racing and Sports content...while other formats such as Tourist Radio, Ethnic Radio, Religious Radio, Ingenious Radio, Special Interest Music formats, etc, have little or no gambling advertising on their services.

However it is important to acknowledge that one of the the first approved Narrowcast formats was Racing and Sport Radio...filling an important gap in the broadcast landscape which was no longer being catered for by National and Community Broadcasters at the time.

ANRA therefore supports Recommendation 26 S-5.149 that..."Gambling advertising on dedicated racing channels or programs should be exempt from the ban".

ANRA also supports Recommendation 26 S-5.150 that..."Small community radio broadcasts on narrowcast and narrowband services should be exempt from further restrictions until December 2025".

As for responding with views on the feasibility and potential impact on the below options, given the confidential nature, ANRA supports each service submitting their individual responses directly to you. I would mention that each service has asked for additional time to compile their responses and submitting to you.

Also it should be taken into account that many of the services hold Commercial, Narrowcast, Narrowband and subscription licences and may also wish to respond though other associations.

In summary, ANRA does not oppose restrictions on gambling advertising on radio excluding dedicated racing channels, commercial, narrowcast or narrowband racing channels.

ANRA looks forward to meeting with you, s22(1)(a)(ii) and other DITRDC team members to discuss these and other topics in relation to the Narrowcast Sector.

Regards s47F

s47F

s47F

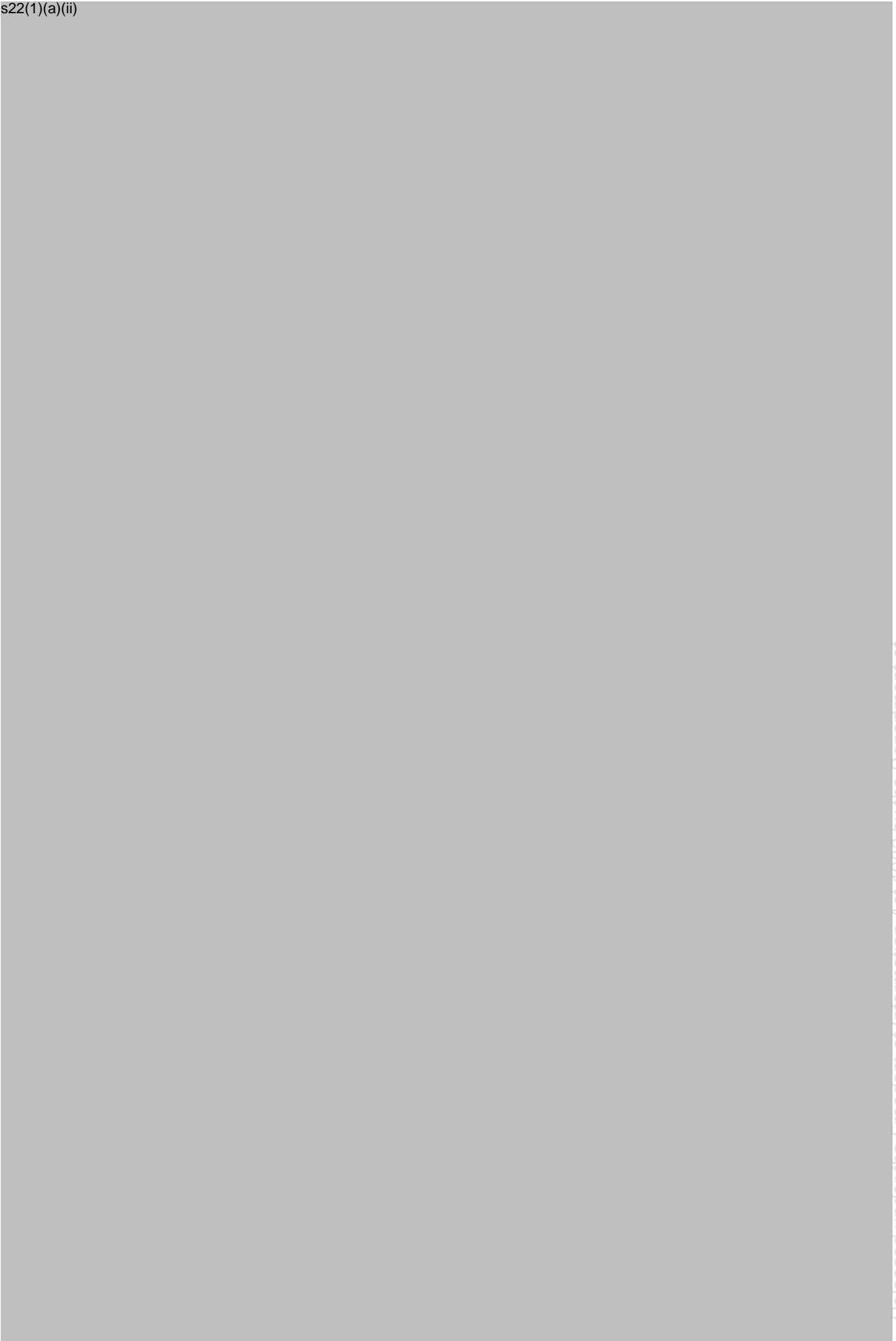
NSW 1595

s47F

s47F

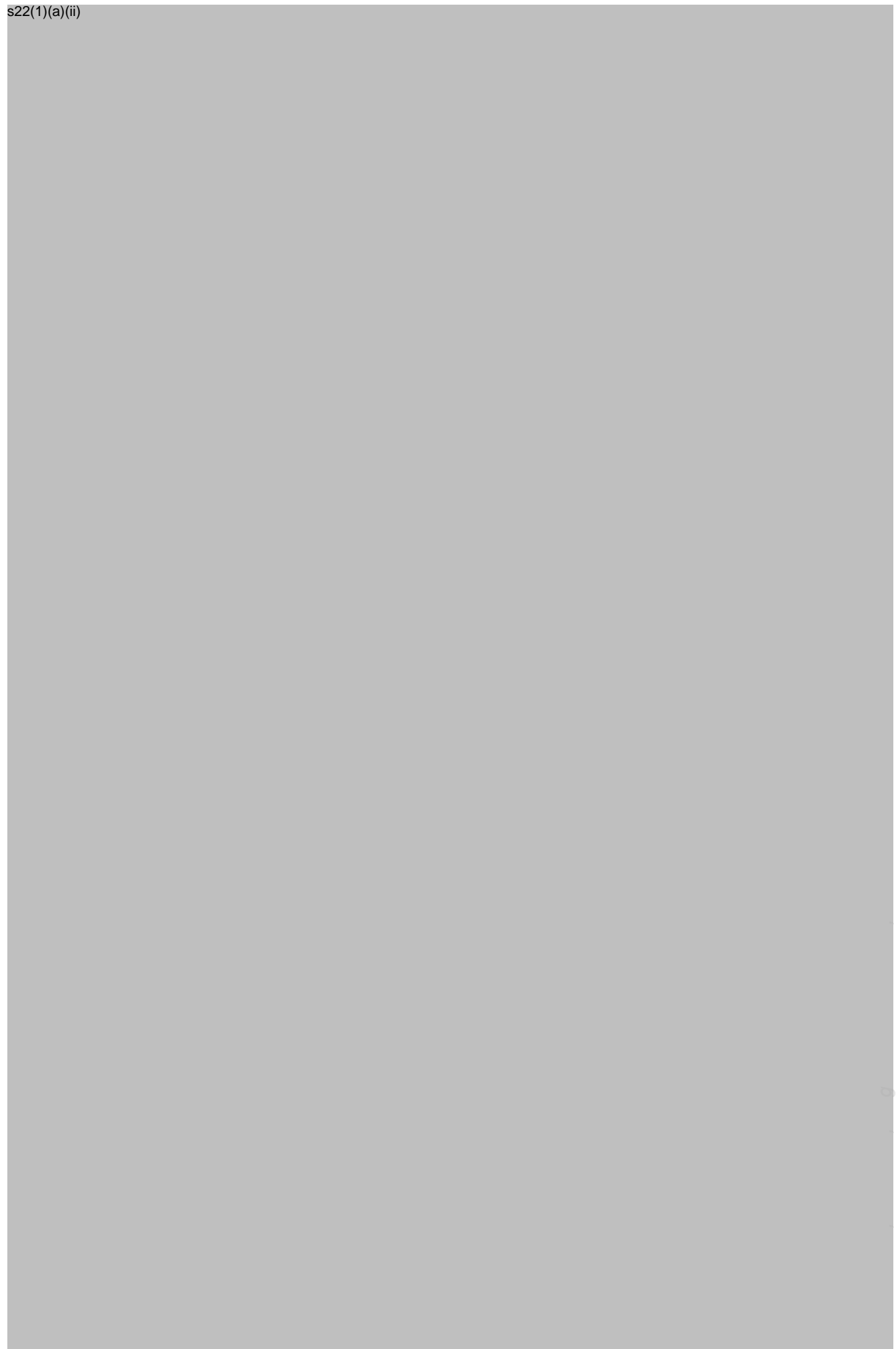
www.anra.org.au

s22(1)(a)(ii)




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s22(1)(a)(ii)



s22(1)(a)(ii)



s47F

Executive Officer of ANRA
E NSW 1595

s47F

s47F anra.org.au
www.anra.org.au

Pages 107 to 163 have been removed under sections 45, 47(1)(b) and 47F of the *FOI Act 1982*

s22(1)(a)(ii)

From: s47F [redacted]@iabaustralia.com.au>
Sent: Friday, 27 October 2023 9:38 AM
To: Lopez, Margaret <Margaret.Lopez@communications.gov.au>
Subject: RE: Gambling advertising reform [SEC=OFFICIAL]

Hi Margaret,
I am still working to get you something ASAP – I'm just finalising approvals. Apologies for the delay. Please note our response will be mainly providing background information in relation to the digital ad environment, technical implementation, and how ads are bought and sold.

Cheers,

s47F [redacted]

s47F [redacted]

Director of Policy & Regulatory Affairs



m: s47F [redacted]
e: s47F [redacted]@iabaustralia.com.au
w: iabaustralia.com.au

s22(1)(a)(ii)

From: s4 [REDACTED] <[REDACTED]@iabaustralia.com.au>

Sent: Thursday, 19 October 2023 9:46 AM

To: Lopez, Margaret <Margaret.Lopez@communications.gov.au>

Cc: s22(1)(a)(ii) [REDACTED] <[REDACTED]@communications.gov.au>; s47F [REDACTED]

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

Subject: RE: Gambling advertising reform [SEC=OFFICIAL]

Hi Margaret,

I was wondering whether it's possible to get a short extension on this request? We are getting closer but still working through it with our members.

Cheers,

s47F

s47F

s47F



m: s47F

e: s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)

w: iabaustralia.com.au

s22(1)(a)(ii)

From: s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)**Date:** Monday, 9 October 2023 at 5:34:08 pm**To:** "Lopez, Margaret" <Margaret.Lopez@communications.gov.au>**Cc:** "s22(1)(a)(ii) [@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au)", s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)**Subject:** RE: Gambling advertising reform [SEC=OFFICIAL]

Thanks Margaret, are we able to share the info request on a confidential basis with board members and key members we think may be impacted? Given the nature of the information being sought, we think that would provide you with the most useful info. You may have contacted some of them already but we think it would be useful for you to have responses from a broad range of publishers & platforms, of varying sizes, to the extent that they are able to assist.

Cheers,

s47F

s47F

Director of Policy & Regulatory Affairs

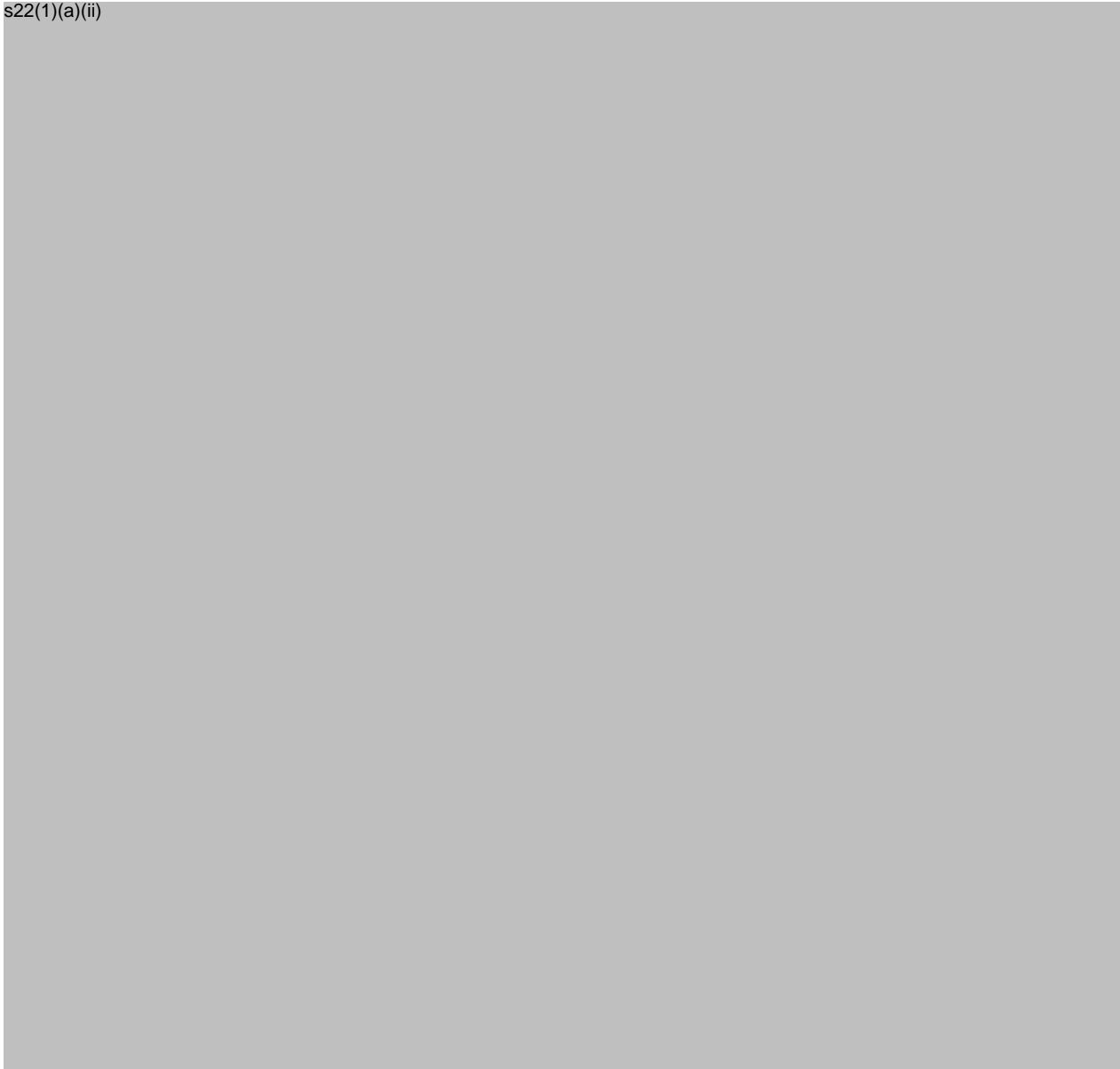


m: s47F

e: s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)

w: iabaustralia.com.au

s22(1)(a)(ii)



OFFICIAL

From: s47F [redacted] <[\[redacted\]@iabaustralia.com.au](mailto:[redacted]@iabaustralia.com.au)>
Sent: Monday, 9 October 2023 3:24 PM
To: Lopez, Margaret <Margaret.Lopez@communications.gov.au>
Subject: Gambling advertising reform

Hi Margaret,

Nice to speak to you just now – just wanted to send through my details. As mentioned, we are keen to understand the direction the Government is thinking of going in, to the extent you can share, so that we can ensure anything that is proposed is workable for members. We are also happy to provide any further info where that would be helpful, to the extent that we can.

Kind regards,

s47F [redacted]

s47F [redacted]

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Director of Policy & Regulatory Affairs



m: s47F

e: s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)

w: iabaustralia.com.au

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Pages 169 to 189 have been removed under sections 45 and 47(1)(b) of the *FOI Act 1982*

s22(1)(a)(ii)

From: s47F @iabaustralia.com.au
Sent: Monday, 30 October 2023 4:01 PM
To: Windeyer, Richard <Richard.Windeyer@communications.gov.au>, s47F @iabaustralia.com.au
Cc: Lopez, Margaret <Margaret.Lopez@communications.gov.au>
Subject: RE: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

Dear Richard and Margaret

Thank you for the opportunity to provide feedback as part of this limited consultation process.

Please find IAB's response attached, and don't hesitate to get in touch if you would like any further information or have questions on any aspect of our response.

Kind regards,

s47F

s47F

Director of Policy & Regulatory Affairs

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s47F

e: s47F [@iabaustralia.com.au](mailto:s47F@iabaustralia.com.au)

w: iabaustralia.com.au

s22(1)(a)(ii)

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Pages 192 to 200 have been removed under sections 22(1)(a)(ii) and 47(1)(b) of the *FOI Act 1982*


From: s47F
To: s22(1)(a)
Cc: Lopez, Margaret; s22(1)(a)(ii); s47F
Subject: Re: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Date: Monday, 6 November 2023 1:05:36 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[image002.jpg](#)
[image006.jpg](#)
[image001.png](#)
[image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[image006.jpg](#)
[img_info.txt](#)
Sensitivity: Confidential

Hi s22(1)

No problem - let me find some times that work for the necessary people at our end and I will come back to you.

Kind regards
s47F

s22(1)(a)(ii)



s22(1)(a)(ii)

From: s47F [REDACTED] <[REDACTED]@sbs.com.au>
Sent: Friday, 20 October 2023 3:56 PM
To: Windeyer, Richard <Richard.Windeyer@communications.gov.au>; Lopez, Margaret <Margaret.Lopez@communications.gov.au>
Cc: James Taylor <James.Taylor@sbs.com.au>; s47F [REDACTED] <[REDACTED]@sbs.com.au>; s47F [REDACTED] <[REDACTED]@sbs.com.au>; s47F [REDACTED] <[REDACTED]@sbs.com.au>
Subject: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Importance: High
Sensitivity: Confidential

Dear Richard and Margaret

Please see below the responses to the information request of 5 October – don't hesitate to get in touch if I can provide any further detail as required.

In addition to the below, there is a related SBS initiative that I will be in a position to brief you about on Monday 30 October. @Richard it would be great to find 15 minutes in your diary that day to discuss if possible.

SBS adheres to the [SBS Code of Practice](#) (incorporating the relevant provisions of the [Commercial Television Industry Code of Practice](#) and guidelines for gambling advertising placed in broadcast), and SBS is limited under the SBS Act to 5 minutes of advertising per broadcast hour. While not required to by legislation or Codes, SBS also restricts advertising on SBS On Demand to 5 minutes per hour.

The limited minutage on SBS platforms means that we carry fewer ads (and consequently, fewer gambling ads) than other television advertisers, and so there is a natural frequency cap. All digital gambling campaigns are set to target 18+.

s47C


s47(1)(b)

s47C

47(1)(b)



s47(1)(b)



I hope this information is of use – I look forward to further discussions on this matter.

Kind regards

s47

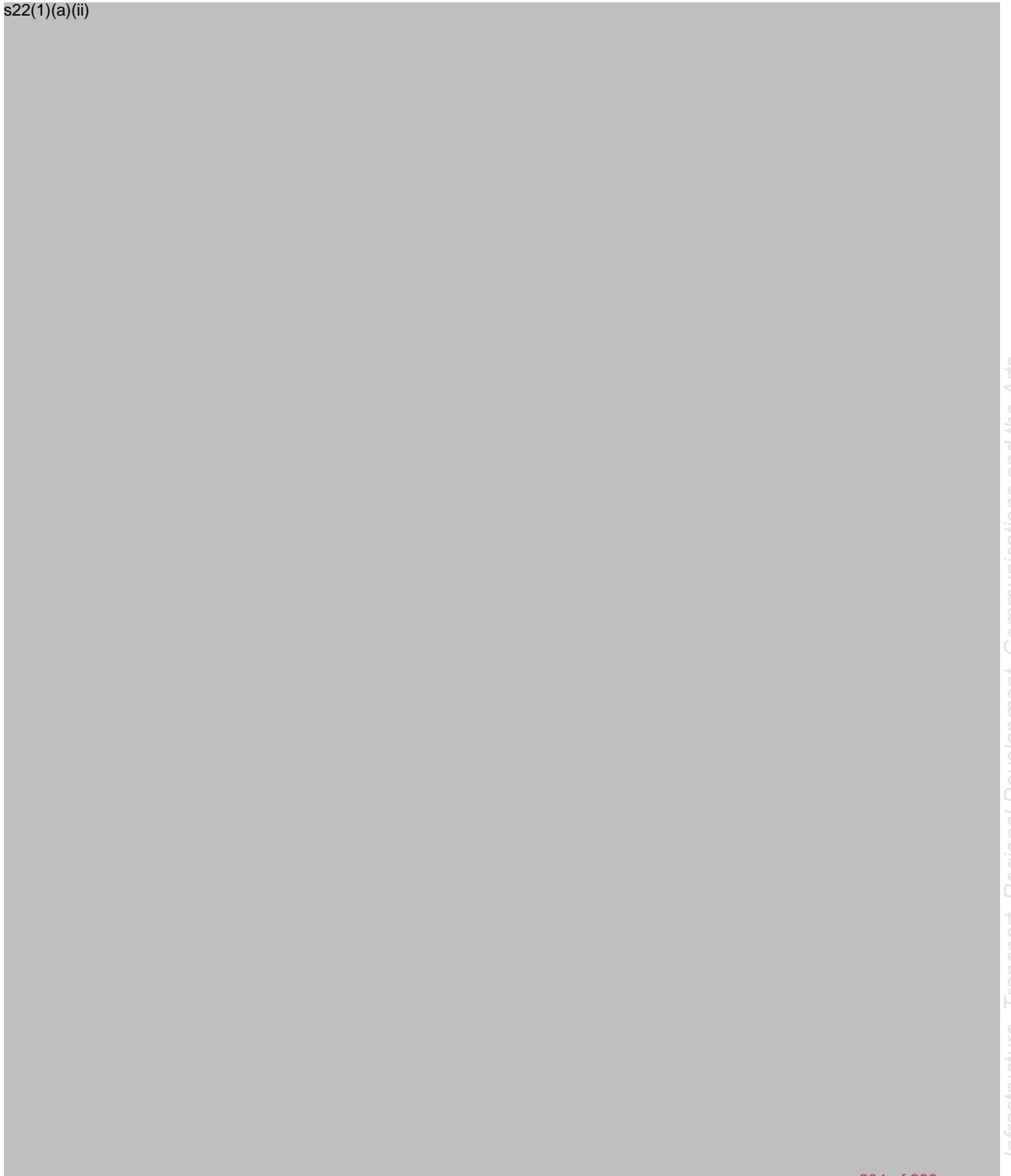
s47F
Director, Corporate Affairs
s47F @sbs.com.au
SBS 14 Herbert Street
Artarmon NSW 2064 Australia
M: s47F T: s47F
sbs.com.au

Open your students' eyes to a world of difference [sbs.com.au/learn](https://www.sbs.com.au/learn)

SBS acknowledges the Traditional Custodians of Country throughout Australia


We are committed to providing accessible and inclusive ways of working, including to enable everyone to participate fully. If I can make some adjustments to the ways, or platforms on which we engage, please let me know.

s22(1)(a)(ii)



Infrastructure, Transport, Regional Development, Communications and the Arts

s22(1)(a)(ii)



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Infrastructure, Transport, Regional Development, Communicat

From: s47F
To: s22(1)(a)
Cc: s22(1)(a); s22(1)(a)(ii) [Lopez Margaret](#)
Subject: RE: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Date: Tuesday, 7 November 2023 2:06:37 PM
Attachments: [image003.png](#)
[image004.jpg](#)
[image005.jpg](#)
[image001.jpg](#)
Sensitivity: Confidential

Thanks s22(1)
() (i)

I have placed a hold in s47F's diary for 1.34 – 2pm on Friday, 10.

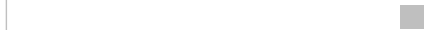
Please note that s47F - s47F and s47F - s47F will be forwarded your meeting planner in order for them to join the meeting.

Regards, s47



s47F
 s47F
 s47F [@sbs.com.au](#)
 SBS 14 Herbert Street
 Artarmon NSW 2064 Australia
 T: s47F
 M: s47F
 sbs.com.au

A picture containing diagram Description automatically generated



SBS acknowledges the Traditional Owners of Country throughout Australia

s22(1)(a)(ii)

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s22(1)(a)(ii)

From: s47F <[REDACTED]@sbs.com.au>
Sent: Monday, 6 November 2023 3:03 PM
To: s22(1)(a)(ii) <[REDACTED]@communications.gov.au>
Subject: FW: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]
Sensitivity: Confidential

Good afternoon,

s47F has limited time this week however is available between 1.30 to 2.30pm on Friday 10 November.
Would that time be suitable to lock in a meeting?

Regards, s47F



s47F
s47F
s47F <[REDACTED]@sbs.com.au>
SBS 14 Herbert Street
Artarmon NSW 2064 Australia
T: s47F
M: s47F
sbs.com.au

A picture containing diagram [REDACTED] Description automatically generated




SBS acknowledges the Traditional Owners of Country throughout Australia

Act 1982 by the Department of
nt, Communications and the Arts

s22(1)(a)(ii)

s22(1)(a)(ii)



From: s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>

Sent: Friday, 20 October 2023 3:56 PM

To: Windeyer, Richard <Richard.Windeyer@communications.gov.au>; Lopez, Margaret <Margaret.Lopez@communications.gov.au>

Cc: s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>; s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>; s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>

s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>; s47F [redacted] <[\[redacted\]@sbs.com.au](mailto:[redacted]@sbs.com.au)>

Subject: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

Importance: High

Sensitivity: Confidential

Dear Richard and Margaret

Please see below the responses to the information request of 5 October – don't hesitate to get in touch if I can provide any further detail as required.

In addition to the below, there is a related SBS initiative that I will be in a position to brief you about on Monday 30 October. [@Richard](#) it would be great to find 15 minutes in your diary that day to discuss if possible.

SBS adheres to the [SBS Code of Practice](#) (incorporating the relevant provisions of the [Commercial Television Industry Code of Practice](#) and guidelines for gambling advertising placed in broadcast), and SBS is limited under the SBS Act to 5 minutes of advertising per broadcast hour. While not required to by legislation or Codes, SBS also restricts advertising on SBS On Demand to 5 minutes per hour.

The limited minutage on SBS platforms means that we carry fewer ads (and consequently, fewer gambling ads) than other television advertisers, and so there is a natural frequency cap. All digital gambling campaigns are set to target 18+.

s47C

47(1)(b)

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s47C

s47(1)(b)

s47(1)(b)

I hope this information is of use – I look forward to further discussions on this matter.

Kind regards

s47

s47F
Director, Corporate Affairs
s47F [@sbs.com.au](mailto:sbs.com.au)
SBS 14 Herbert Street
Artarmon NSW 2064 Australia
M: s47F T s47F
sbs.com.au

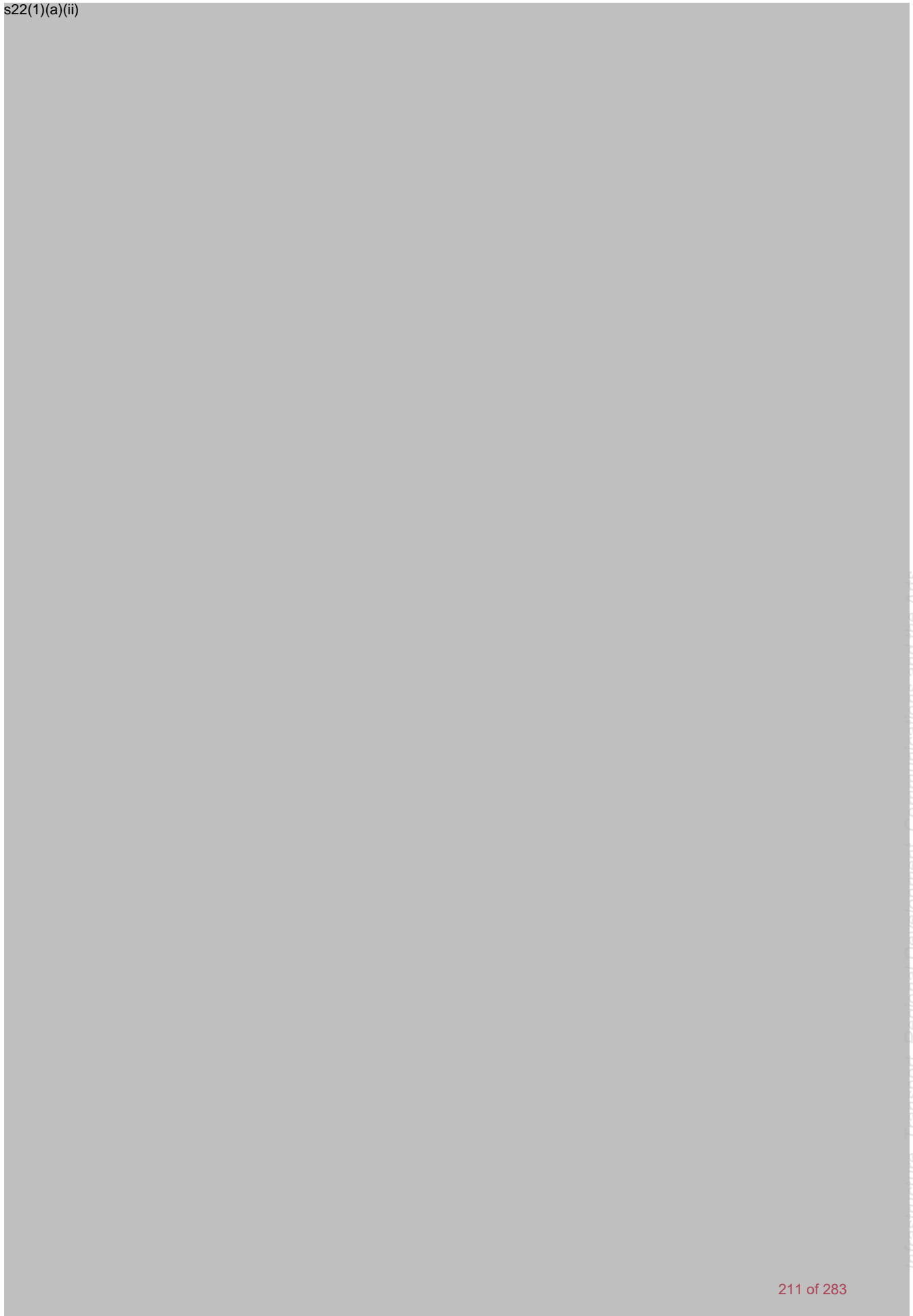
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SBS acknowledges the Traditional Custodians of Country throughout Australia

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Infrastructure, Transport, Regional Development, Communications and the Arts

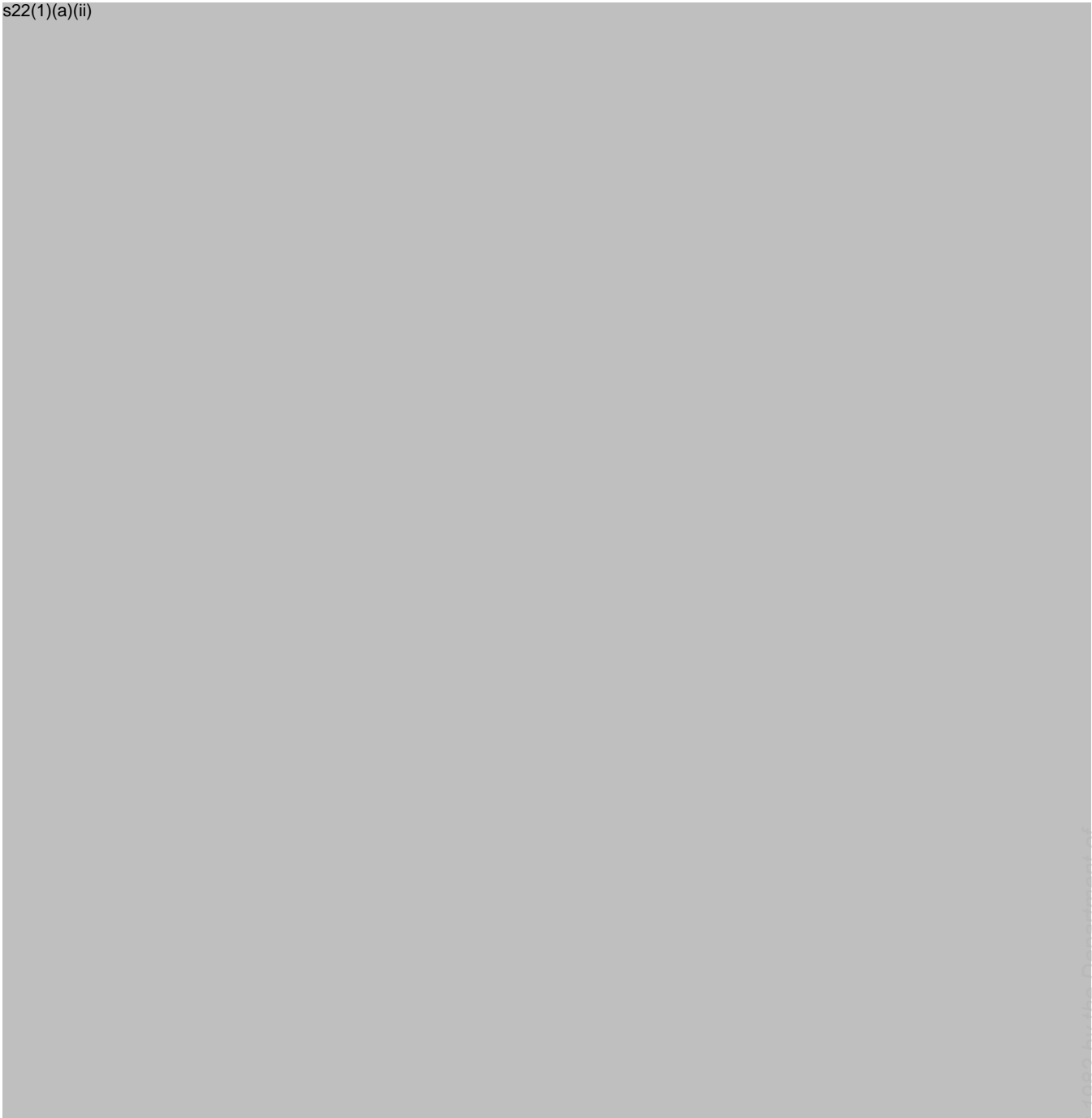
We are committed to providing accessible and inclusive ways of working, including to enable everyone to participate fully. If I can make some adjustments to the ways, or platforms on which we engage, please let me know.

s22(1)(a)(ii)



Infrastructure, Transport, Regional Development, Communications and the Arts

s22(1)(a)(ii)



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From: s47F
To: s22(1)(a)(ii) s47F s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s47F
s22(1)(a)(ii) Lopez, Margaret; s47F ; s22(1)(a)(ii) s47F
Subject: DITRDCA / SBS - Gambling Advertising Discussion [SEC=OFFICIAL]
Date: Friday, 10 November 2023 6:38:00 AM

DITRDCA / SBS - Gambling Advertising Discussion [SEC=OFFICIAL]

Scheduled: 10 Nov 2023 at 1:45 pm to 2:30 pm, GMT+11

Location: Webex

Invitees: s22(1)(a)(ii) s47F s22(1)(a)(ii) s22(1)(a)(ii)
s22(1)(a)(ii) s47F s22(1)(a)(ii) , Lopez, Margaret, s47F
s22(1)(a)(ii) s47F

s47F

Pages 214 to 261 have been removed under sections 22(1)(a)(ii), s45, 47(1)(b) and 47F of the *FOI Act 1982*

From: s47F
To: s22(1)(a)(ii)
Cc: [Lopez, Margaret](#); s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s47F
Subject: RE: [EXTERNAL] Wagering Advertising Reforms - Information Request - Due by COB 15 January 2024
[SEC=OFFICIAL]
Date: Friday, 15 December 2023 11:08:24 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[image008.png](#)

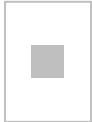
Hi

Just noting that s47F email address is:

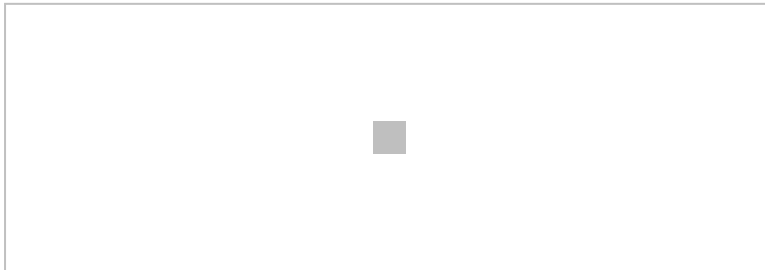
s47F [@foxtel.com.au](mailto:s47F@foxtel.com.au).

Kind regards

s47F



s47F
Chief General Counsel & Executive Director of Regulatory
M s47F
5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



s22(1)(a)(ii)

Pages 263 to 276 have been removed under sections 22(1)(a)(ii), 47(1)(b) and 47F of the *FOI Act 1982*

From: s47F
To: s22(1)(a)(ii)
Cc: [Lopez, Margaret](#); s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii); s47F
Subject: RE: Wagering Advertising Reforms - Information Request - Due by COB 15 January 2024 [SEC=OFFICIAL]
Date: Wednesday, 20 December 2023 12:50:30 PM
Attachments: [image004.png](#)
[image001.jpg](#)
[image002.png](#)
[image005.png](#)

Hi s22(1)(a)(ii)

Confirming this has now been received (it did go straight to Junk). We will absolutely endeavour to respond by the due date, however SBS's corporate shutdown commences on Saturday and runs until 8 January. Given this timing and the delay in receipt, I anticipate that we may have some genuine difficulty with the right people being available, noting the detail and complexity of the request. We will update you in the week commencing 8 Jan to advise on progress.

Thank you also for the advice regarding confidentiality.

As previously advised to other parts of the Dept, s47F is on leave for the entirety of January and I will be on leave and overseas without reliable reception from 3-17 January. Can you please add s47F as a key contact. s47F while I am overseas. I have copied them both in to this email.

Kind regards

s47F



s47F

Director, Corporate Affairs

s47F [@sbs.com.au](mailto:s47F@sbs.com.au)

SBS 14 Herbert Street

Artarmon NSW 2064 Australia

M: s47F T: s47F

sbs.com.au

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SBS acknowledges the Traditional Custodians of Country throughout Australia.

We are committed to providing accessible and inclusive ways of working, including to enable everyone to participate fully. If I can make some adjustments to the ways, or platforms on which we engage, please let me know.

s22(1)(a)(ii)

Pages 278 to 280 have been removed under section 22(1)(a)(ii) of the *FOI Act 1982*

From: s47F
To: s22(1)(a)(ii)
Cc: [Lopez, Margaret](#); s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii); s47F
Subject: FW: [EXTERNAL] Wagering Advertising Reforms - Information Request - Due by COB 15 January 2024 [SEC=OFFICIAL]
Date: Friday, 22 December 2023 9:52:13 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[image012.png](#)

Dear Margaret,

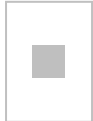
I refer to the Wagering Advertising Reforms – Information Request due by 15 January 2024.

Due to various employee absences over the holiday period, it would be appreciated if the Foxtel Group could please have a short extension until 29 January 2024 to respond to this request.

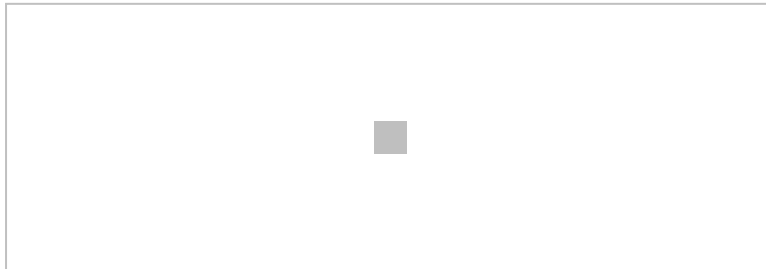
We look forward to hearing from you.

Kind regards,

s47F



s47F
 Senior Legal Counsel
 T s47F M s47F
 5 Thomas Holt Drive, North Ryde NSW 2113 foxtel.com.au



This email is confidential and may be subject to legal or other professional privilege.

s22(1)(a)(ii)

Pages 282 to 283 have been removed under section 22(1)(a)(ii) of the *FOI Act 1982*