



**Mobile Broadband Group**  
**PO Box 34586, London SE15 5YA**

27<sup>th</sup> January 2006

The Consultation Coordinator  
Gambling Commission  
Bekshire House  
168-173 High Holborn  
London WC1V 7AA

Dear Sir,

The Mobile Broadband Group ("MBG", whose members are O2, Orange, T-Mobile, Virgin Mobile, Vodafone and 3) is pleased to make a brief response to the Gambling Commission's consultation on its "Statement of Principles on Licensing and Regulation"

The mobile operators' interest in the activities of the Gambling Commission with respect to licensing relates mainly to the regulation and licensing of remote gambling.

Mobile operators' place in the remote gambling value chain varies from providing basic connectivity to the Internet and thus to Internet sites offering remote gambling, to offering, through contractual arrangements between a gambling operator and a mobile operator, remote gambling on the portal of the mobile operator. Any licences that will have to be acquired under UK law, will be acquired by the gambling operator partner. We do not expect that mobile operators will seek to be involved with any licensable activity themselves. It is in everyone's interests, though, that remote gambling is properly conducted and that mobile gamblers, who are also our customers, are properly dealt with. We are therefore supportive of the principles that the Gambling Commission has set out in its document.

The MBG also supports the open and transparent way in which it has conducted the consultation. The Commission will be aware that that the remote gambling market is developing fast and that customers have gained huge benefits in terms of enjoyment from the new services. We therefore support your ambition, as set out in 1.13, to regulate vigorously in the public interest, be targeted, evidence based and to take a risk based approach. This will be essential to both protect consumers and to promote innovation and investment in facilities based in the UK. In furtherance of this, it will be very important to maintain good channels of communication between the Commission and all sections of the industry.

The MBG notes that the Commission will carry out further consultation on the detailed Codes of Practice and we look forward to participating in that exercise.

Yours sincerely,

*Hamish MacLeod*

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