

17 May 2013

The Legislative Council Secretariat  
Hong Kong SAR Government  
Bills Committee on Betting Duty (Amendment) Bill 2013  
1 Legislative Council Road  
Central, Hong Kong

Dear Sirs

The Singapore Turf Club (STC) has been in a commingling arrangement with TabCorp Victoria (TV) in Australia since June 2010 and we would like to share our experience in this regard with the Committee.

In this commingling arrangement, bets placed in Victoria, Australia on our races simulcasted to Australia are commingled into our totalisator pools in Singapore. This has generally benefited our customers in the form of enlarged pools which, in turn, has resulted in more stability in our dividends. The customers of TV also benefit by having access to much larger totalisator pools than the ones which used to be operated on our races by TV alone.

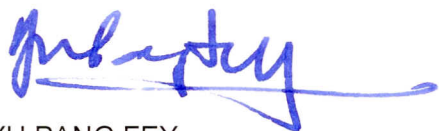
Having enlarged totalisator pools and more stable dividends also help us in our constant battle against illegal operators, both local and overseas, who take bets illegally on our races.

We have been simulcasting races from Hong Kong Jockey Club (HKJC) and operating totalisator pools on them in Singapore for many years. This is mutually beneficial to us and HKJC; our customers have the opportunity to enjoy the high-quality racing in Hong Kong and HKJC generates additional revenue from bets placed in Singapore.

Commingling of bets placed in Singapore into the HKJC totalisator pools (subject to an agreement being in place between the two organisations) will enhance this arrangement by allowing for benefits similar to those enjoyed by us and TabCorp Victoria, as set out above. In short, our customers will have access to the much larger totalisator pools operated by HKJC and HKJC will add even more liquidity and depth to their totalisator pools.

We hope this submission will help the Commission in its deliberations on the Betting Duty (Amendment) Bill 2013.

Yours faithfully



YU PANG FEY  
PRESIDENT & CHIEF EXECUTIVE