



香港賽馬會  
The Hong Kong Jockey Club

30 May 2013

Legislative Council Secretariat  
Council Business Division 2  
Legislative Council Complex  
1 Legislative Council Road  
Central, Hong Kong  
Attn: Ms Alice Leung  
(Fax: 2509 9055)

公司事務執行總監  
麥建華

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Dear Ms Leung,

**Bills Committee on Betting Duty (Amendment) Bill 2013**

**Meeting on 27 May 2013**

I refer to your letter dated 28 May 2013 inviting The Hong Kong Jockey Club (HKJC) to respond to views expressed by members of the public at the deputation held on 27 May on the captioned Bill. Please find below our consolidated responses.

Part 1: Views from Society for Truth & Light and Gambling Watch

1. The question whether HKJC would introduce new bet types on the basis of commingling is a misunderstanding. The objective of commingling is to unify the odds of a local pool with those of a non-local pool, to eliminate arbitrage. It has nothing to do with introduction of new bet types.
2. The Government will not be involved in HKJC's negotiations with overseas partners because such negotiations will be technical (such as systems and the calculation of odds) and commercial (such as royalty and product fees). The basis of Government's involvement in policy and regulatory issues will not be affected by alignment of odds under commingling. As already explained, the elimination of arbitrage opportunities will help to contain illegal and offshore gambling and the related social and criminal problems.

3. There were some concerns due to a misunderstanding whether the existing pari-mutual betting regime will be maintained after the launch of two way commingling. It should be pointed out that the alignment of odds under commingling is by definition based on the pari-mutual regime, which is an international norm. In other words, fixed odds betting (e.g. Jockey Challenge) will not be compatible with or included in the commingling arrangements.
4. One of the questions was whether HKJC's jackpots for exotic bets would be increased substantially by incoming bets, thus making them more attractive to bettors in Hong Kong. The HKJC wishes to point out that due to the difference in betting interest, overseas exotic pools e.g. Triple Trio betting and Six Up on Hong Kong races are generally very small. Therefore, the concern that the pool would be substantially increased due to injection of overseas bets into local exotic pool is unlikely. It is also not possible for pari-mutual bets from overseas to be mixed with or commingled into jackpots in Hong Kong.

#### Part 2: Views from Wong Kwai-sang, an HKJC Telebet staff

5. Mr Wong claimed that staff shortage at the HKJC Telebet Centres was creating stress to those on duty in particular during evenings. This is simply not true. The HKJC bases rosters on objective statistics on customer calls pattern and work load of our Telebet staff. For the busy horse racing period, statistics have shown that on average, Telebet staff spend 60% of the time handling calls and 40% of the time standing by. This is because for each race at 30 minute-interval, the public tend not to place bets immediately after the preceding race but would wait till they have had time to study the runners in the current race. The percentage of phone handling would be even lower than 60% during non-raceday evenings.

#### Part 3: Views from the written submission by "A Group of Disgruntled Telebet Staff"

6. The written submission claimed that Contract Part-time Employees working at the HKJC Telebet Centres were not given the same benefits as full time staff but were barred from taking up non-HKJC part time work. This is incorrect. There are no restrictions on part time employees from taking up non-HKJC work. The restrictions on external employment only apply to HKJC's full time staff.
7. It should be pointed out that peak periods of incoming telebet calls fall on racedays. This pattern naturally lends itself to handling the

calls by part time staff and the employment opportunity so generated is very much welcome by the working public and is an important source of supplementary family income for housewives and post-secondary students.

8. However, for some of those who are prepared to commit to a fixed number of working hours per month, HKJC has long introduced a Contract Part-time Employment, with many of the benefits of full time employees, including annual paid and sick leave, maternity leave, MPF contributions by the employer, long service award etc. Contrary to the submission, Contract Part-time Employees are encouraged to apply, and are given priority, for full time posts.

Yours sincerely,



Kim Mak  
Executive Director, Corporate Affairs

c.c. Hon Tommy CHEUNG Yu-yan, SBS, JP

Secretary for Home Affairs  
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