

Ålands Penningsautomatförening ("Paf") is a gaming company owned by the provincial government of Åland with the purpose of collecting money to good causes by providing safe and entertaining gaming services to the public in selected markets.

As this is quite an extensive and wide questions, Paf would be pleased to further discuss these questions in a face to face meeting.

*Question 1:*

*What level of responsibility do the consultative bodies think should be aimed for in a future Norwegian gaming model?*

Generally Paf is of the opinion that both the alternatives 2A and 2B should be aimed for in a future Norwegian gaming model. We believe that it's important to keep a high level of responsibility.

When it comes to the usage of gaming budgets, deposit limits, loss limits or time limits our experience is that, depending on the customer segment, different tools suit some customers better than others. It's therefore important to keep the requirements flexible and to give the players the possibility to choose the limitations and the limitation tool themselves.

Classification or monitoring of a problematic gaming behaviour is an important instrument which Paf has been working with since 2011. Still this is quite a new area within the gaming industry and not a lot of research have been published regarding this. In our experience there are different kinds of gaming patterns and motivations to play and there might be a challenge in adopting a general monitoring algorithm.

Paf finds it important to make the players aware of their gaming and their gaming patterns. For example to provide easy to use summary of stake, winnings and net loss/net winnings. We have also with good results been doing interventions towards certain player segments where we mirror their behavior by sending them graphs and statistics about their gaming.

Paf thinks that another important area for gaming operators is to understand how to communicate with its' players about responsible gaming in the most effective way. Paf has for example taken initiative to a [research cooperation](#) with Stockholm University where Paf will finance a ph.D student that will do four different studies within this area.

For bonuses and free spins it should be aimed to allow them but to put requirements that they are presented and implemented in a transparent way. There is hardly any other business where bonuses or discounts are not allowed so why wouldn't it be allowed in the gaming industry?

As this is quite an extensive and wide question to answer with such short notice, Paf would be pleased to further discuss these matters in a face to face meeting.

*Question 2:*

*What level of protection do the consultative bodies think will be possible to establish under a licensing model?*

Paf believes that it's important and possible to establish a high level responsibility and protection of the players as long as the requirements are not too rigid so that the players decide to play at unlicensed operators. For example Paf thinks that it will be possible to enforce mandatory limits, as long as the players are allowed to take an active part and decide the levels of the limits themselves.

*Question 3:*

*How do the consultative bodies view the idea that revenue can be secured for the voluntary sector from gaming under a licensing scheme, compared with the current monopoly in which Norsk Tipping's surplus goes directly for the purposes?*

Paf is of the opinion that revenue could be secured for the voluntary sector, for example by allocating an amount equal to the surplus of Norsk Tipping to the voluntary sector through the tax revenues from the gaming under the licensing scheme.

*Question 4:*

*In the event of a continuation of the monopoly model, what measures do the consultative bodies think should be implemented in order to ensure that the level of gambling problems continues to be held low, and that Norsk Tipping succeeds in channelling players to regulated games?*

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*Question 5:*

*How do the consultative bodies view such far-reaching liability instruments?*

We are positive to have a national blocking registry for self-exclusion and have positive experience in working with them as being licensed in Spain and Estonia. However to implement maximum loss limits by a government authority and to have the limits to apply across the gaming companies will probably lead to that players will instead play at unlicensed operators.

Paf has no deeper knowledge of the Norwegian Personal Data Act but would assume that there would be some legal challenges connected to the Personal Data Act.

*Question 6:*

*Is it feasible to introduce such instruments in a licensing scheme?*

See answer on question 5.

*Question 7:*

*Will a licensing scheme with extensive responsibility tools such as the Gaming Authority describes be attractive to possible applicants for a licence?*

See answer on question 5.

*Question 8:*

*What specific measures do the consultative bodies think may not be possible or desirable to implement under a licensing model?*

See answer on question 5.

*Question 9:*

*What challenges do the consultative bodies think will arise?*

One big challenge for the operators would be if the requirements are not in line with or differs dramatically from the common practices in other licensed jurisdictions as it would then create a lot of extra compliance development and costs for the operators.

*Question 10:*

*How do the consultative bodies view this issue?*

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*Question 11:*

*How do the consultative bodies view the practicability and desirability of introducing such measures in order to bar unregulated operators from the Norwegian gaming market?*

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*Question 12:*

*The Gaming Authority outlines three different forms of blocking web pages: blocking IP addresses, blocking DNS addresses and DPI-based blocking. How do the consultative bodies view these different forms of blocking as measures for protecting the Norwegian regulated market?*

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