

IN THE MATTER of the Gambling Act 2003

AND on an application by
CHRISTCHURCH CASINOS LIMITED for approval of new game mixes

BEFORE THE GAMBLING COMMISSION

Members: P Chin (Chief Gambling Commissioner)
M M Lythe
P J Stanley
G L Reeves

Date of Application: 3 March 2010

Date of Decision: 19 March 2010

Date of Notification
of Decision: 30 March 2010

**DECISION ON AN APPLICATION BY CHRISTCHURCH CASINOS LIMITED
FOR APPROVAL OF NEW GAME MIXES**

Introduction

1. Christchurch Casinos Limited ("CCL") applied to the Commission, under condition 9 of its operator's licence, for approval of new game mixes which all include 5-box Black Jack. CCL also applied to remove the current restriction of automatic shufflers operating on no more than 50% of open Black Jack tables.
2. The relevant licence condition is as follows:

CCL's operator's licence

9. The Licence Holder may operate on casino gaming tables the game types and game mixes specified in Annex A attached to this Licence. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

Submissions by CCL

3. CCL submitted, in summary, that:

(a) In decision GC01/10, the Commission asked it to review its approved game mixes and remove those that are redundant. It has done this, by removing 16 game mixes.

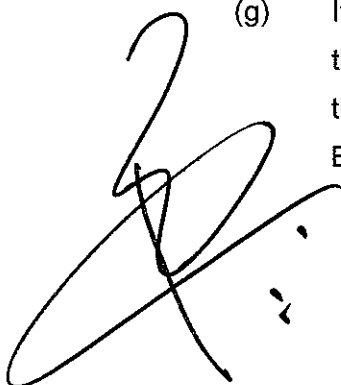
(b) Decision GC01/10 also corrected an error in the footnotes to Annex A by including a CCA approval which provides that Licence Holders are permitted to

operate automatic shufflers on no more than 50% of open Black Jack tables. This had an immediate impact at Christchurch casino and accelerated its desire to review its game mixes to provide automatic shufflers on all of its Black Jack tables.

- (c) If it is entitled to have automatic shufflers on up to 50% of its Black Jack tables, its regulatory benchmark should be reviewed upwards to reflect this.
- (d) It has read draft work on casino gambling opportunities for each table game prepared by SKYCITY. In that work, SKYCITY calculated that an automatic shuffler increases the theoretical rate of play on a Black Jack table from 127 to 136 rounds per hour, or an increase of 7.086%.
- (e) It believes that this result is correct as there are typically between four and five manual shuffles performed on a Black Jack table every hour. These take approximately one minute each to complete. Therefore, if no manual shuffling is required due to the introduction of an automatic shuffler, around four or five minutes per hour of additional play could be possible. $4.5/60$ equals around 7%.
- (f) Applying this logic, it has reviewed its existing benchmark, game mix A, and proposes that it be amended upwards with the addition of automatic shufflers to half of its 14 Black Jack tables, as follows:

A 36 TABLES		Decisions PH	Total Decisions	Player Spaces	Total Spaces
BJ + Shuffler	7	72	504	21	147
BJ	7	67	469	21	147
AR	10	31	340	21	210
TB & AR	1	49	49	35	35
CS	3	26	78	7	21
MD	3	43	129	27	81
MB	1	60	60	21	21
MW	1	25	25	24	24
PO	2	18	36	10	20
TS- Single	1	36	36	12	12
Total	36		1726		718

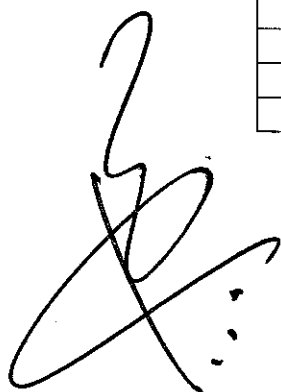
- (g) It wants to introduce automatic shufflers on all its Black Jack tables except for those in game mix A. This will generate additional gambling opportunities, but these are more than compensated for by the introduction of two tables of 5-box Black Jack in each game mix in place of the regular 7-box Black Jack.



- (h) The footnotes to Annex A should be amended to remove the limitation of no more than 50% of open Black Jack tables being able to operate with automatic shufflers.
- (i) The new game mixes have fewer player spaces and fewer rounds per hour than its proposed regulatory benchmark as follows:

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Game mix	No. of rounds per hour	Player spaces
A – Existing	1691	718
A – Proposed	1726	718
B	1725	692
C	1671	681
D	617	670
E	1563	609
F	1509	648
G	1555	662
H	1455	637
I	1501	651
J	1491	646
K	1483	649
L	1600	676
M	1646	664
N	1668	661
O	1650	659
P	1660	664
Q	1614	650
R	1639	667
S	1631	670
T	1585	656
U	1577	659
V	1567	654
W	1523	648
X	1513	643
Y	1469	637
Z	1459	632
AA	1451	635
AB	1480	629
AC	1693	678
AD	1643	662
AE	1614	668
AF	1610	673
AG	1608	673
AH	1591	653
AI	1598	668
AJ	1505	646
AK	1457	632
AL	1495	632
AM	1644	682
AN	1627	662
AO	1637	667
AP	1629	653
AQ	1621	665
AR	1619	665
AS	1611	651
AT	1453	646
AU	1489	635
AV	1441	621



The Secretary's submissions

4. The Secretary submitted, in summary, that:
- (a) CCL submitted that an additional five rounds per hour should be added to the rate of play for Black Jack to recognise the effect of automatic shufflers. CCL has therefore presented game mix A with half of its Black Jack tables generating 72 rounds per hour, rather than the usual 67. This figure has been extrapolated from the results of a SKYCITY trial on rates of play. The Commission has yet to consider the results of the SKYCITY trial and any reliance on its findings by CCL may be premature.
 - (b) The Commission has previously considered an application by SKYCITY, leading to decision GC11/07, in which SKYCITY submitted figures of 92 and 96 rounds per hour respectively for 7-box and 5-box Black Jack tables with automatic shufflers. These figures were the result of several trials and observations by SKYCITY in support of that application. If these rates were applied to CCL's application, game mix B would present more opportunities than CCL's current benchmark, on the basis of his indicative calculations. He has prepared a revised schedule of the proposed game mixes utilising the faster rate of play for Black Jack, as follows:

A handwritten signature in black ink, consisting of a large, stylized initial 'S' followed by a series of loops and a long horizontal stroke extending to the right.

Game mix	No. of rounds per hour	Player spaces	Overall opportunities
A – Existing	1691	718	35,234
A – Proposed	1866	718	38,909
B	1993	692	40,007
C	1919	681	38,255
D	1845	670	36,503
E	1771	512	21,227
F	1697	648	32,999
G	1763	662	34,749
H	1623	637	31,247
I	1689	651	32,997
J	1679	646	32,747
K	1671	649	32,745
L	1828	676	36,404
M	1894	664	37,274
N	1916	661	37,374
O	1898	659	37,122
P	1908	664	37,372
Q	1842	650	35,622
R	1867	667	36,603
S	1859	670	36,601
T	1793	656	34,851
U	1785	659	34,849
V	1775	654	34,599
W	1711	648	33,097
X	1701	643	32,847
Y	1637	637	31,345
Z	1627	632	31,095
AA	1619	635	31,093
AB	1668	629	31,864
AC	1941	678	38,355
AD	1871	662	35,451
AE	1822	668	35,680
AF	1818	673	35,832
AG	1816	673	35,818
AH	1799	653	34,839
AI	1806	668	35,568
AJ	1693	646	32,845
AK	1625	632	31,081
AL	1683	632	32,299
AM	1872	682	37,318
AN	1855	662	36,339
AO	1865	667	36,589
AP	1857	653	36,057
AQ	1849	665	36,351
AR	1847	665	36,337
AS	1839	651	35,805
AT	1751	646	34,062
AU	1677	635	32,311
AV	1609	621	30,547

- (c) The Commission has not yet made specific comment on the rates of play ascribed to Black Jack by SKYCITY. However, while CCL's application has logic to it, in the absence of further evidence on the effect of automatic shufflers on game speed to contradict the stance taken by SKYCITY, and prior to the Commission's consideration of SKYCITY's rate of play trial, it is premature to accept CCL's proposed rate of play.
- (d) With the exception of proposed game mix B, he is satisfied that the new game mixes will not increase in opportunities for casino gambling. He discussed this with CCL which stated that, if the Commission agreed that it would be premature to accept CCL's submission on rate of play, then the application should be progressed without game mix B.
- (e) In relation to CCL's request to amend the footnotes to Annex A, the Commission could consider the footnotes that were used for Black Jack in decision GC27/09.

CCL's submissions in reply

5. In reply, CCL submitted as follows:

- (a) One of the key outcomes of its application is to deploy automatic shufflers on all Black Jack tables on all game mixes, except game mix A. The Secretary has confirmed that, even using a different method of assessment, all game mixes, except game mix B, represent fewer gambling opportunities than the revised benchmark.
- (b) The assessment used by the Secretary was based on a previous calculation submitted by SKYCITY in 2007 and approved by the Commission in decision GC11/07. It does not agree with that calculation but, notwithstanding this, if the Commission is not convinced by its argument, it would be prepared to exclude game mix B so that the remaining game mixes may be approved without delay.
- (c) The 5-box Black Jack tables in each of its game mixes will have a new table layout with only five positions available (as opposed to the regular 7-box layout with two boxes closed).
- (d) The SKYCITY submission leading to decision GC11/07 identifies at least three different methods to assess game speed for Black Jack with an automatic shuffler, none of which gave rise to a consistent result. SKYCITY selected one method which resulted in a 37% increase in game speed for Black Jack with automatic shufflers, and applied this to obtain an indicative game speed of 92

rounds per hour for 7-box Black Jack with an automatic shuffler, and 96 rounds per hour for 5-box Black Jack with an automatic shuffler.

- (e) SKYCITY subsequently proposed yet another method in its latest workings, suggesting a maximum theoretical value for Black Jack with and without a shuffler of 136 and 127 rounds per hour respectively. This is an increase of $\frac{9}{127}$ or 7.086%, which is what CCL used in its application.
- (f) It has completed its own surveillance review of 16 hours of Black Jack play on tables with automatic shufflers over the period 5-8 March 2010. The results show the average game speed to be around 82 rounds per hour, with an average number of players of 3.6. Its surveillance also shows that as the number of players increase, the rate of play decreases.
- (g) It does not agree that a shuffling machine results in a 37% increase in the number of decisions per hour – it may be possible with a fewer number of players, but would not be realistic when applied across the maximum number of players.
- (h) It considers the 7.5% increase in potential gambling opportunities as proposed in its original application to be more accurate.
- (i) It has no issue with the Secretary's suggestion that the footnotes be in a style similar to those used in decision GC27/09.

Analysis

6. By decision GC01/10, the Commission approved a new Annex A for Christchurch casino, and amended the footnotes to the Annex to re-insert a reference to an earlier Casino Control Authority approval which had been omitted inadvertently from an earlier annex. That approval provided that "[CCL] is permitted to operate automatic shufflers on no more than 50% of open Black Jack games specified in game mixes" As a result of the re-insertion of the reference, CCL applied to remove the 50% restriction and to approve the use of automatic shufflers on all of its Black Jack tables, except those in game mix A.

7. CCL submitted that the inclusion of the reference to the CCA approval increases its regulatory benchmark, because the deployment of automatic shufflers on 50% of its 14 Black Jack tables will increase the rate of play on these tables, a submission that the Secretary did not oppose.

8. CCL's submission is misconceived. The re-inserted reference to the CCA approval does not increase CCL's benchmark as CCL was already entitled to deploy automatic shufflers on 50% of its open Black Jack tables pursuant to the approval. That is, the CCA approval

was in place on 19 September 2003 and remains current. CCL is entitled to have recognised any opportunities that the approval conveys, but the re-insertion of the approval in the footnotes does not increase CCL's entitlement, it simply records it accurately.

9. CCL next submitted that the introduction of automatic shufflers on Black Jack tables in its other game mixes would increase the speed of those game mixes, but that the increases in speed would be offset by the introduction of two 5-box Black Jack tables in each game mix, rather than the usual 7-box variety.
10. The Commission has considered this type of application previously – for SKYCITY Auckland (see decision GC11/07). In that application, the Commission approved SKYCITY's proposal to introduce 5-box Black Jack in a number of game mixes to offset the increased rate of play from the installation of automatic shufflers (and thus to keep those game mixes below its regulatory benchmark). In that decision, the Commission went through the "pros and cons" of permitting the introduction of automatic shufflers on all Black Jack tables, concluding that the benefits of their introduction outweighed any detriment. The Commission also considered that the proposal provided adequate certainty as SKYCITY would utilise 5-box Black Jack tables, rather than closing 2 boxes on a 7-box table.
11. CCL's approach is consistent with SKYCITY's in that it will utilise 5-box tables rather than closing two tables at a 7-box table, and the Commission remains of the view that the benefits of permitting the use of automatic shufflers on all Black Jack tables outweighs any detriment, provided that opportunities are not thereby increased.
12. The Commission then considered whether the proposed game mixes would increase opportunities for casino gambling. CCL submitted that all of its proposed game mixes offer fewer opportunities than its regulatory benchmark, based upon new figures that SKYCITY is currently working on in relation to rate of play. The Secretary was of the view that it is premature to rely upon this new data, and that it is preferable to use the information SKYCITY submitted in its earlier application to introduce 5-player Black Jack.
13. The Commission concurred with the Secretary's submission. SKYCITY's new information has not been critically considered by the Commission and it is not appropriate to do so in an application to which SKYCITY is not a party, presenting its own test information to the Commission for proper scrutiny. In this case, CCL is asking the Commission to adopt information for which CCL is not responsible and which departs significantly from what the Commission has previously proceeded on. The Commission has consistently resisted adopting the sort of mathematical calculations presented in this application in preference

for maintaining a common sense, "in the round" assessment of the likely effect of a proposed change on the level of opportunities. The wide variety of indications obtained from various studies, tests and observations indicates that the hasty adoption of any one test, without understanding thoroughly its limitations, could produce serious error.

14. The Secretary submitted that game mix B may present more opportunities than CCL's current benchmark, based upon his calculations.
15. The Commission's approach when determining whether a proposed game will increase opportunities for casino gambling is to compare what is proposed against the current regulatory benchmark, game mix A. The Commission compared the proposed game mixes with game mix A and, with the exception of game mix B, was satisfied that none of them would increase opportunities for casino gambling. The Commission was not satisfied that game mix B would not increase opportunities. The Commission therefore approved an amended Annex with game mix B omitted. Game mixes C-AV have been renamed B-AU.
16. Finally, the Secretary submitted that the footnotes should be drafted in the style set out previously by the Commission in decision GC27/09. In that decision the Commission included the relevant footnote as follows:

2. The Licence Holder is permitted to operate automatic shufflers on:
 - ...
 - 50% of open Black Jack tables specified in Game Mix A;
 - all Black Jack tables specified in Game Mixes B, C, D, E, F, G, H, I, J, K, L, M and N;
 - ...
 - ...

17. CCL did not object to the Secretary's proposal. For reasons of consistency the Commission concurs that a similar footnote should be included in Annex A, and has drafted one accordingly.

Decision of the Commission

18. The Commission decided to approve a new Annex A (as amended by the Commission) (attached under condition 9 of CCL's operator's licence).

Peter Chiu
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

30 March 2010

ANNEX A

Pursuant to condition 9 the following game mixes may be operated by the Licence Holder on casino gaming tables subject to the following conditions and requirements:

- A. Roulette – 10 games
Black Jack – 14 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 3 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 2 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising 14 terminals and 1 manual table)
- B. Roulette – 8 games
7-Box Black Jack – 10 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- C. Roulette – 8 games
7-Box Black Jack – 9 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 5 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- D. Roulette – 8 games
7-Box Black Jack – 8 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 6 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



- E. Roulette – 8 games
 7-Box Black Jack – 7 games
 5-Box Black Jack – 2 games
 Caribbean Stud Poker – 3 games
 Midi Baccarat – 5 games
 Mini Baccarat – 1 game
 Money Wheel – 1 game
 Poker – 7 games
 Tai Sai (single) – 1 game
 Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

- F. Roulette – 8 games
 7-Box Black Jack – 8 games
 5-Box Black Jack – 2 games
 Caribbean Stud Poker – 2 games
 Midi Baccarat – 5 games
 Mini Baccarat – 1 game
 Money Wheel – 1 game
 Poker – 7 games
 Tai Sai (single) – 1 game
 Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

- G. Roulette – 8 games
 7-Box Black Jack – 6 games
 5-Box Black Jack – 2 games
 Caribbean Stud Poker – 3 games
 Midi Baccarat – 5 games
 Mini Baccarat – 1 game
 Money Wheel – 1 game
 Poker – 8 games
 Tai Sai (single) – 1 game
 Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

- H. Roulette – 8 games
 7-Box Black Jack – 7 games
 5-Box Black Jack – 2 games
 Caribbean Stud Poker – 2 games
 Midi Baccarat – 5 games
 Mini Baccarat – 1 game
 Money Wheel – 1 game
 Poker – 8 games
 Tai Sai (single) – 1 game
 Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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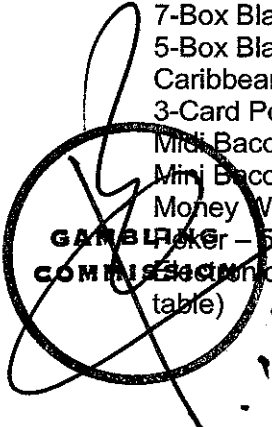
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Money Wheel – 1 game
Poker – 9 games
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Money Wheel – 1 game
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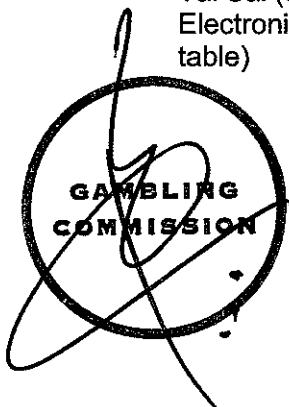
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Money Wheel – 1 game
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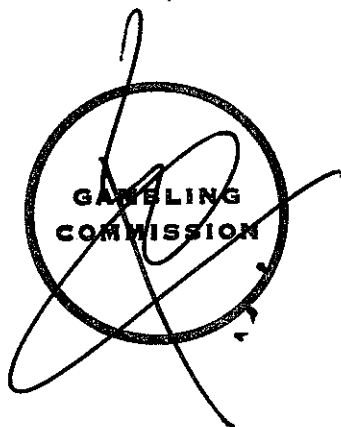
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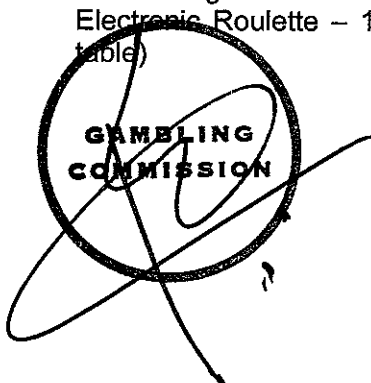
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3-Card Poker – 2 games
Midi Baccarat – 6 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



- AE. Roulette – 8 games
7-Box Black Jack – 8 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 6 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AF. Roulette – 8 games
7-Box Black Jack – 8 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holden – 1 game
Midi Baccarat – 6 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AG. Roulette – 8 games
7-Box Black Jack – 8 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Ultimate Texas Holden – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AH. Roulette – 8 games
7-Box Black Jack – 8 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Ultimate Texas Holdem - 1 game
Midi Baccarat – 6 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



AI. Roulette – 8 games
7-Box Black Jack – 7 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AJ. Roulette – 8 games
7-Box Black Jack – 6 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holdem - 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AK. Roulette – 7 games
7-Box Black Jack – 7 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holdem – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AL. Roulette – 8 games
7-Box Black Jack – 9 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holdem - 1 game
Midi Baccarat – 6 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

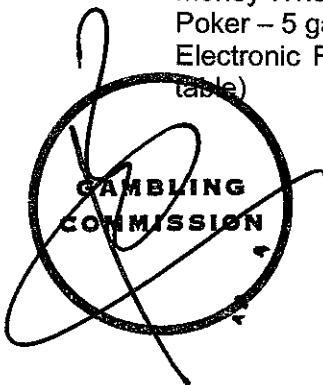


AM. Roulette – 8 games
7-Box Black Jack – 9 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Ultimate Texas Holdem – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AN. Roulette – 8 games
7-Box Black Jack – 9 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holdem - 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
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3-Card Poker – 1 game
Ultimate Texas Holdem – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 5 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AS. Roulette – 7 games
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Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AT. Roulette – 7 games
7-Box Black Jack – 7 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 9 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



- AU. Roulette – 7 games
7-Box Black Jack – 6 games
5-Box Black Jack – 2 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Ultimate Texas Holdem – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 9 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

Notes

1. The Licence Holder is permitted to change between the above table game mixes, subject to providing the Inspectorate with weekly advice of the table game mix to be used for the forthcoming week, and five working days notice of any change from one approved game mix to another.
2. The Licence Holder is permitted to operate automatic shufflers on:
 - 50% of open Black Jack tables specified in Game Mix A; and
 - all Black Jack tables specified in Game Mixes B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AB, AC, AD, AE, AF, AG, AH, AI, AJ, AK, AL, AM, AN, AO, AP, AQ, AR, AS, AT and AU.

Consolidated to 19 March 2010

