

IN THE MATTER of the Gambling Act 2003

AND of an application by **SKYCITY
HAMILTON LIMITED** for approval
of alternative game mix

BEFORE THE GAMBLING COMMISSION

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

Date of Application: 13 April 2006

Date of Decision: 9 June 2006

Date of Notification
of Decision: 23 June 2006

DECISION

**ON AN APPLICATION BY SKYCITY HAMILTON LIMITED
FOR APPROVAL OF AN ALTERNATIVE GAME MIX**

Application

1. SKYCITY Hamilton Limited (the "**Applicant**") applied to the Gambling Commission (the "**Commission**") for approval of an alternative game mix to introduce electronic roulette (Rapid Roulette) and a single sided Money Wheel, in place of a manual roulette game and a Caribbean Stud Poker game.
2. The two existing table game mixes for the SKYCITY Hamilton casino (approved pursuant to decision GC26/05) and the proposed table game mix are summarised below:

	Table Numbers		
	A	B	
Black Jack	11	10	10
Roulette	5	5	4
Midi Baccarat	3	3	3
Mini Baccarat	1	1	1
Caribbean Stud Poker	2	2	1
Tai Sai (single sided)	1		
Money Wheel (single sided)			1
Poker		2	2
Rapid Roulette (12 players)			1

3. The Applicant sought approval of the alternative game mix in advance of approval of a floor plan associated with the game mix, and acknowledged that it would need to seek Commission approval (under condition 6.1 of its venue licence) for a floor plan before implementing the proposed game mix.

Submissions by the Applicant

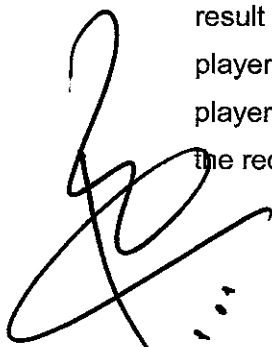
4. The Applicant submitted that the proposed game mix would not increase opportunities for casino gambling as it equated to 447 player spaces at tables, a reduction on the 467 player spaces available on 19 September 2003, when the prohibition on increases in opportunities for casino gambling took effect, and on the 464 player spaces presently permitted under game mix A. In calculating player spaces, the Applicant gave Poker a value of 10 player spaces, rather than the maximum of 11 player spaces permitted under the Game Rules, on the basis that the Poker games played at the Hamilton casino accommodated a maximum of 10 persons.
5. The Applicant submitted that the overall impact on rate of play of the proposed game mix was likely to be neutral or decreased, when compared with game mix A, and on request provided supplementary data confirming this position. Data from a study conducted at the Christchurch casino, which indicated that the proposed game mix would result in a decrease in the rate of play, compared with the games they will replace, is as follows:

Game installed	Estimated rounds/spins per hour	Game removed (Plan A)	Estimated rounds/spins per hour	Impact on rounds/spins per hour
Poker	18	Black Jack	67	- 49
Poker	18	Tai Sai	36	- 18
Money Wheel	25	Caribbean Stud Poker	26	- 1
Rapid Roulette	49	Roulette	34	+ 15
Total				- 53

6. The Applicant submitted that the new games would not create more wagering options than the games they replaced.

Submissions by the Secretary

7. The Secretary submitted that he had no concerns with the proposed game mix. He originally stated that it was not obvious to him whether the changes in game mix would result in an overall increase in rate of play. However, taking into account the reduction in player spaces from game mix A (464 player spaces) to the proposed game mix (447 player spaces), he considered that any increased rate of play that may arise is offset by the reduced number of player spaces.



8. Commenting on the supplementary information provided by the Applicant, the Secretary stated that the Applicant appeared to have demonstrated a decrease in overall rate of play.

Analysis

9. In decision GC26/05, the Commission approved the two alternative game mixes specified in Plans C and D attached to that decision. The Commission has since approved Plans A and B with the same game mixes, but different floor layouts, in decision GC02/06. Approval of the proposed game mix would provide a third game mix, with Rapid Roulette and a single sided Money Wheel.
10. The Commission approached its assessment of whether the proposed game mix may increase opportunities for casino gambling by first considering player spaces, and then rates of play.
11. In relation to player spaces, the Applicant has calculated Poker as having 10 player spaces rather than 11, which is the maximum provided under the Game Rules. The Applicant has done so on the basis that the Poker tables at Hamilton casino accommodate a maximum of 10 players. The Applicant has not, however, sought to impose a restriction on the number of player spaces for Poker.
12. In these circumstances, the Commission considers the proper approach is to calculate player spaces for Poker at 11 player spaces. The Commission notes the Applicant's intention regarding the use of its Poker tables, but does not see it as being necessary in this case to specify a maximum number of 10 players for Poker, given the overall reduction in player spaces.
13. The Applicant did not initially provide any data in support of its submission that there would be no increase in rate of play associated with the proposed changes to the game mix. On request, the Applicant supplemented its application with data from a review of game speeds carried out at the Christchurch casino in either 1999 or 2000. While the Applicant qualified this data by stating that the study was specific to the Christchurch casino environment, and the Game Rules and equipment in place in that casino at the time, the results did provide an insight into the various speeds at which the different games are played. The supplementary data indicated that there would be approximately 53 less rounds per hour associated with the proposed game mix, compared with the game mix in Plan A.
14. The Commission was satisfied, given the reduction of player spaces and the decline in rate of play, that approval of the proposed game mix would not increase opportunities for casino gambling.

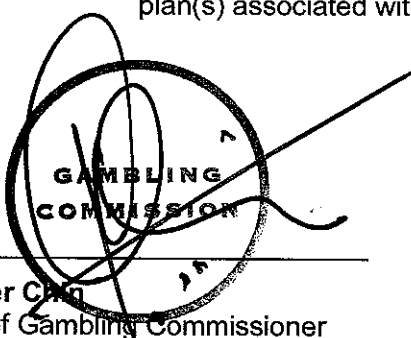
Decision of the Commission

15. The Commission decided unanimously that the proposal was consistent with the Act and approved table game mix C as follows:

Black Jack	10
Roulette	4
Midi Baccarat	3
Mini Baccarat	1
Caribbean Stud Poker	1
Money Wheel (single sided)	1
Poker	2
Rapid Roulette (12 players)	1

16. Approval was given subject to the following requirements:

- (a) Except as specifically provided, the foregoing list refers to manual versions and does not extend to or permit the introduction of any electronic versions or new electronic aids or enhancements. If electronic versions, aids or enhancements are sought to be introduced, an application is required by the Licence Holder for approval of a revised floor layout.
- (b) Table Game Mix C cannot be implemented until the Commission approves floor plan(s) associated with that game mix.



**GAMBLING
COMMISSION**

Peter Chin
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

23 June 2006