Dear Sirs

I am writing to you about the Government consultation on Proposals for Changes to Maximum Stake and Prize Limits for Category B,C and D Gaming Machines.

Backhousebet is an independent bookmaker, originally established in 1921. The group has always had strong West Country connections with shops originally up to 60 miles away from our Head Office in Bradford-on-Avon. Then in 2010 we expanded by buying six shops further afield - Stourport on Severn, Worcester, Swindon, Wokingham, Daventry and Welwyn Garden City. In March 2011 we opened our 19th shop on the outskirts of Tewkesbury at Northway.

The Company employs 103 staff, of which over 50 are paid at or just over the minimum wage (under £7 per hour). Many are part time, and, like other bookmakers, women and those aged 18-25 are well represented in our workforce.

Seven of our betting shops are local monopolies. Closure of any of these shops would therefore mean the residents of the town or suburb travelling by car elsewhere to have their cash bets (or betting online with a bookmaker who will probably be offshore and contributing nothing in tax or Horserace Levy).

A further 8 shops have only one competitor - closure here would leave a monopoly shop and reduce choice for the consumer. Only 4 of our shops have 2 or more competitors.

Our last audited accounts showed a pre-tax loss of £270,000. As a result, we made a number of severe cost savings including cutting our annual staff costs of £1.75 million by about £100,000 with co-operation from our staff over removing premium payments for Sunday and Bank Holiday working. The financial year just ended will have been profitable - a tribute to the hard work at difficult times by all our staff.

However many of our shops are still marginal, including five of the seven shops with no competition.

The next year will be more difficult because of the introduction of Machine Gaming Duty. This was meant to be a revenue-neutral exercise, but the Government and HMRC "welshed" on that commitment and Backhousebet will be around £75k pa down as a result. I suppose I shouldn't be surprised that there is more honour amongst those who take bets and have bets than there is among those in the Government and HMRC. I have never known such anger among the business people I meet in bookmaking than has been caused by this reneging from a firm commitment. Some of us spent many unpaid hours helping HMRC to get the detail of the tax right, only to find they are now laughing off their easy promises.

And now we are faced by a campaign to reduce the stakes and/or prizes on gaming machines. This seems to be an unholy alliance between other sectors of the gaming industry and those with a moral issue about gambling. There is no evidence to link problem gambling (low in this country by international standards) with any particular gambling product. Those with moral issues are usually religious/class opponents of the ordinary adult who is engaging in a fun and harmless activity. These wowsers are the sort of people who, unlike Baroness Thatcher, do not want to give back "control to people over their own lives and over their livelihood".

In addition to staff training, we make a voluntary contribution to the Responsible Gambling Trust (RGT) - an organisation which works to minimise the level of problem gaming in the UK. The RGT has announced that it is to commission the biggest ever programme of academic research into gaming machines in Britain in order to understand better how people behave when playing these machines and what helps people to stay in control and play responsibly.

I welcome this research and an evidence based debate around gaming machines. However, decisions that will effect the livelihood of thousands of people must be based on evidence and facts. Every one of our shops would be unprofitable if you took away the income from gaming machines.

Please could you therefore ensure that there will be no adverse ruling on gaming machines arising from the consultation. These are ordinary voters who will lose their jobs, and these are ordinary adults who will lose the freedom to engage in a valued leisure pursuit.

Yours faithfully,

Will Roseff

Managing Director

backhousebet

12a St Margarets Street

Bradford-on-Avon

Wiltshire BA15 1DA