

From: "Alkalay, John" <JoAlkalay@ccsd.ws> on 12/12/2007 02:10:02 PM

Subject: Reg. GG -- Internet gambling

RE: Comments regarding the UIGEA Regulations (Treas-DO-2007-0015)

After reading the regulations very carefully, I am struck by how vague they are. I am sure that whoever wrote them had to vague because various definitions are still legally unclear at this point. What is illegal internet gambling and what online sites provide internet gambling? What are games of skill and what are games of chance? Why are certain types of gambling acceptable and others are not?

It seems like the regulations place a heavy burden on the banks to make decisions on issues not yet clearly defined. How does my bank know if I'm transering money to a site considered legal by the regulations?

If my bank takes the approach of overblocking transactions to perfectly legal sites, I'll just take my business elsewhere. Some legal types, however, may pursue action which would be a major headache for the banks.

This brings me to issue of enforcement. There is no standard for the banks to follow so one bank may be more lenient than another in how they interperet the regulations. Furthermore, individuals will certainly find a way to move money around legally given all the loopholes in the regulations.

As an individual, i am totally clueless about what is legal and illegal for me. According to the regulations, I can still play games of skill (chess, bridge, etc.). I can bet the horses if I want. What about poker? There is no specific mention of it in the regulations.

Bottom line for me is that the vagueness of the regulations leaves the board with the possibility of facing many legal challenges. It is not cost effective for the government to try and enforce or the banks to try and follow.

Sincerely,

John Alkalay