

From: info@ibca.com.au
To: [Magliano, Sophie](#)
Cc: [Hatfield, David](#); [Exemptions](#)
Subject: RE: ACCC Determination A91531 - Revocation Application [KCL-ACTIVE.FID486694] [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3297523]
Date: Wednesday, 16 November 2022 3:51:21 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Sophie,

Please find following the answer to your questions:

- **Please explain the nature of the agreement that centres will collect membership fees and provide them to TBA. Are these agreements reflected in contracts?**

The nature of the agreement between Centres and TBA involved Independent Centres agreeing to collect membership fees on behalf of TBA as they didn't have the ability to collect the fees or contact the bowlers. TBA have also conveyed the message that they would prefer to have an online registration process.

Centres agreed to bowler registration as this was the primary form of revenue for the TBA. Bowler membership made up over 70% of TBA's revenue stream. They also didn't have secondary form of income at that time. (As of 2020 membership makes up only 30% of revenue and the TBA also has a commercial interest and revenue stream).

As part of the above mentioned agreement, Centres agreed to have 85% of their centre league database register with TBA- however there was no "penalty payment" at the time as they have recently introduced. In return it was agreed that IBCA would have a seat on the TBA Board and involvement (as a key stakeholder) in strategy planning for programs to be deployed in centres. In approximately 2016, IBCA funded and produced a "roadshow" assisting in promoting the registration process in each State.

There is no written agreement between the IBCA, any centres and TBA that reflects this agreement, to my knowledge. I was on the TBA Board at the time of this being agreed to. The nature of the relationship between TBA and IBCA has changed considerably since that time.

- **To what extent does the authorised conduct allow the parties to encourage development in the sport of tenpin bowling?**

From a Centre viewpoint, the current authorised conduct does not encourage the development of the sport. As TBA does not participate in the gaining (or recruiting) of bowlers, some feel they get members by default and provide no support and guidance on a centre level.

Centres develop the sport at their own cost and discretion and many centres are now leaning more towards social participation rather than league (sport) participation.

TBA does not contact individual centres in order to increase recruitment to the sport. They concentrate more on the elite level of the sport.

- **How are new bowlers attracted to the sport?**

New bowlers are attracted to the sport through the effort of individual centres marketing programs. For example, a bowler will attend a centre for recreational fun with friends. A staff member will approach the bowler and ask if they are interested in

attending a “come and try” session or similar. The hope is that this person will become a league bowler. TBA plays no role whatsoever in the recruitment process or the marketing.

- **What roles do TBA and the centres play in that?**

Centres do the marketing at their own cost and through their own networks. TBA do not provide ideas, programs or advice on the marketing of recruiting bowlers.

Once a bowler is recruited, centres may access a program called Bowl Patrol (kids coaching). I estimate that about 20% of centres have had limited success with Bowl Patrol (a coaching program). I tried it in my centre, but it was expensive to implement, labour intensive and limited numbers made it prohibitive to run in a metro centre. Along with other centres, we privately developed a “10 for 10” program which had a bigger impact and had longevity for the sport. We approached TBA on several occasions to combine the programs to no avail.

TBA do not assist centres with any programs.

Sophie, having said all this, centres in no way want to see TBA fail. We feel that there is a place for TBA, but with the change in funding model, and the fact that they now operate their own facility (in direct opposition to other centres) that the current agreement is no longer required. Centres should be able to have a choice to either register bowlers or not register them, based on the type of league that it is.

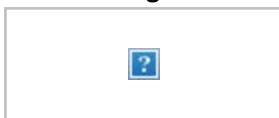
The fact that they are threatening the centres with deregistration is also an issue for centres. It is proving harder and harder to recruit to the sport, without the added pressure of TBA registration to contend with.

If I can assist any further I would be happy to provide more information.

Kind Regards,

Edi De Pellegrin

Edi De Pellegrin



From: Magliano, Sophie <Sophie.Magliano@acc.gov.au>

Sent: Wednesday, 9 November 2022 3:03 PM

To: info@ibca.com.au

Cc: Hatfield, David <david.hatfield@acc.gov.au>; Exemptions <exemptions@acc.gov.au>

Subject: RE: ACCC Determination A91531 - Revocation Application [KCL-ACTIVE.FID486694]
[SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3297523]

OFFICIAL

Dear Edi

Thank you for your time speaking to us on 31 October 2022. We are close to being in a position to make a decision on your application, however would appreciate further clarification regarding the following:

1. Please explain the nature of the agreement that centres will collect membership fees and provide them to TBA. Are these agreements reflected in contracts?
2. To what extent does the authorised conduct allow the parties to encourage development in the sport of tenpin bowling? How are new bowlers attracted to the sport? What roles do TBA and the centres play in that?

We would appreciate if you could please respond to these queries in writing by 18 November 2022, such that we can publish this information on the public register.

Kind regards
Sophie

Sophie Magliano

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The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.

My pronouns are she/her