

Hon Kris Faafoi MP  
MP for Mana  
Bowen House, L11  
Parliament Buildings  
Private Bag 18 888  
Wellington 6160  
New Zealand

25<sup>th</sup> April 2019

RE: Consultation in relation to Ticket Resale laws

Dear Minister,

Thank you for your letter dated 14th March 2019 asking for input to help shape Government's understanding of the New Zealand ticketing industry and to help develop potential proposals for reform in this area.

I attach a copy of my previous letter setting out Ticketmaster's position on ticket resale and bots. I would like to take this opportunity to reiterate the points made in that letter especially the consumer protection offered on Ticketmaster Resale and the importance of a level playing field for all operators.

Ticketmaster supports all efforts made by the New Zealand Government to ensure that fans are protected when buying and reselling tickets on any online ticketing platform. Ticketmaster Resale provides a safe and secure marketplace where fans can buy and resell tickets in New Zealand.

Like the Minister, Ticketmaster is committed to protecting consumers and ensuring that markets work competitively. The key to optimum market efficiency will come from consistent enforcement against all providers, including those offshore.

Ticketmaster and Ticketmaster Resale operate in multiple territories with multiple legislative requirements and in each market, operates legally and with the needs of the consumer and the fan central to our business.

Our service to the consumer, allowing them the ability to resell a ticket should they be unable to attend the event, is offered using advanced proprietary software and technology systems overseen by dedicated customer service teams in a safe and transparent environment. Ticketmaster continues to lead and innovate in a fast-moving shift to digital tickets. Digitisation of the industry will offer benefits to event organisers, artists and fans to buy, share and sell tickets without friction.

Ticketmaster does not accept the suggestions in the "Ticket Reselling in New Zealand Discussion Document", issued by your Ministry, that Ticketmaster's vertical integration has the negative effects. By operating both a primary and secondary platform, we provide a reliable service where fans can obtain verified resold tickets.

However, we are pleased that the non-statutory measures Ticketmaster has introduced, such as the 'Verified Fan' system, are held up by your Government as exemplar ways for addressing issues in the ticketing resale market. We are proud of the work we do to offer the consumer a safe market in which to sell and resell tickets.

Adding to Ticketmaster's suite of anti-scalping technologies, Ticketmaster is in the final stages of rolling out Real Time Ticket Limits in New Zealand. Real Time Ticket Limits is a product designed to stop "bad actors" from purchasing over the maximum number of tickets allowed on a per event basis; in real time. This is another tool that Ticketmaster will use to provide real fans with an equal chance to get tickets to see their favourite events live.

Ticketmaster has taken a strong stance against bots and has led the way in influencing new legislation to combat the use of bot technology. We have zero tolerance for bot use and will cancel tickets that we identify as having been purchased using them.

In the UK we lobbied the UK Government to legislate against bot technology. The UK Govt has now done so by introducing the Breaching of Limits on Ticket Sales Regulations which came into force on 5th July 2018.

Only last week the European Parliament has adopted further anti-bot legislation which all member states will have to write into national law within two years of June 2019. This landmark EU-wide legislation against ticket bots is an important step for European ticketing law and one that Ticketmaster wholeheartedly welcomes. Markets without anti-bot legislation will begin to look out of step.

Finally, it might be helpful when looking at the policy impact of price caps on the resale market for the NZ Government to consider that Ontario in Canada is scrapping part of its law that capped ticket resale prices as it was found to be unenforceable in practice.

As we stressed in our previous letter, we believe that the biggest issue for regulators is in ensuring that all resale websites that target New Zealand consumers comply with existing and new ticketing legislation and that legislation is enforced. The success of any reforms to secondary ticketing can only be measured by how effective enforcement is across the whole market, including against offshore operators.

Ticketmaster remains committed to working with Government to ensure consumers are given access to a safe and well-regulated ticketing market for events.

Our executive team would be happy, as always, to meet with officials to discuss any of the above matters in person.

Yours sincerely,



Maria O'Connor  
Managing Director Ticketmaster Australasia

