

**Testimony of Alan Feldman  
Regarding House Bill 1319  
Before the Maryland House Ways and Means Committee  
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Chair Atterbeary and members of the House of Delegates Ways and Means Committee, my name is Alan Feldman, and among other responsibilities, I am currently a Distinguished Fellow in Responsible Gaming at the International Gaming Institute at the University of Nevada, Las Vegas, working to develop programs and policies to advance related knowledge and capabilities within the gaming industry.

I have over 30 years of experience in the gaming industry with an international gaming operator during which time I spearheaded the launch of an innovative, player-focused responsible gambling program that encourages players to adopt behaviors and attitudes that can reduce the risk of developing gambling disorders. I currently serve as Chair Emeritus of the International Center for Responsible Gaming, as a member of the Responsible Gaming Committee for the International Gaming Standards Association and I Chair the Nevada Advisory Committee on Problem Gambling. I have also previously served as a member of the Gambling Research Advisory Committee for the Massachusetts Gaming Commission.

Based on my experience in the field of responsible gaming, I am frequently asked about the differences between land-based and online gambling as it relates to the implementation of Responsible Gaming strategies. It is not unusual for lawmakers and regulators to have concerns that online gaming is potentially more harmful than its land-based counterparts. This has not proven to be true.

At the outset, let me state that there are effective measures that can be taken by operators of both forms of gambling. However, internet or online gambling (iGaming) provides a unique opportunity to accurately monitor gambling behavior in real environments which may allow intervention for those who encounter difficulties, an unquestionable benefit over land-based forms of gambling.

Historically, gathering data from gamblers is challenging due to the high levels of misreporting in self-report data collection. This statistical defect is all but eliminated in an online format where all data is collected and reported accurately.

Player account-based gambling is utilized for multiple forms of Internet, mobile and land-based gambling through player cards and user-names. Player accounts track and store a wealth of data on gambling behavior and related activities. Whereas in land-based examples, players often have multiple accounts with a single operator, online gambling allows for comprehensive analysis of a player's activity within individual operators' systems.

Tracking online gambling data creates opportunities for operators to easily access activity such as money wagered, number of gambling days, deposits, wins, and losses. Such indicators are

informative, but do not, on their own, identify the potential for future gambling problems. By way of example, individuals who engage heavily in gambling are not necessarily those who develop gambling problems. In fact, studies in the US over the past 4 decades indicate the prevalence of those with a diagnosable gambling disorder have remained at or just under 1 percent of adults. We have yet to find the exact mixture of data points that can identify this minority of customers, although it's something that academics and even for-profit companies constitute to strive to understand.

Consequently, the combination of activity-based indicators with indicators that are still in development using AI and machine learning may better capture individuals at risk for gambling problems.

Gambling research has been justifiably criticized for its reliance on self-report rather than behavioral measures. Research analyzing player account data may advance conceptual models, identify behavioral risk factors for problem gambling and evaluate and guide effective policy and responsible gambling programs.

Although research utilizing player account data has unique limitations, it offers considerable benefits for researchers, operators and regulators. Research methodology incorporating the use of player account data stands to make significant contributions to the gambling field.

Account-based behavioral models are already used by e-commerce providers, including gambling operators, to understand customers and provide appropriate levels of customer support, marketing, feedback and communication.

We are at the early stages of researching player data and I would advise the Committee to be wary of anyone promoting the idea that data can "identify" a problem gambler simply by reviewing their activity. That said, there are several companies that seem to be closing in on identifying the right mix of data points in order to reduce false positive rates and produce targeted and effective interventions.

The longitudinal and dynamic nature of player account data does enable patterns and deviations from patterns to be tracked. The type of player account data which is possible to be tracked for every iGaming player includes, but is not limited to the following key indicators:

- Length of Play
- Frequency of Play
- Average Wagers
- Total Wagers for a Specified Period of Play
- Trajectory of Wagers

By comparison, it is impossible to accurately track many of these same data points for players who frequent land-based casinos without using loyalty cards. This is significant because changes in individual play patterns may be more relevant than comparison to group norms because of the

variation between individuals. Online data makes detailed tracking of individual play patterns possible.

Furthermore, players may be compared to others with similar play patterns as opposed to attempts to generalize all players to a single baseline. Gamblers are often classified in research trials as either 'excessive' or 'normal', based on amount of time, expenditure and number of trips to gambling venues. However, these variables may differ between forms of gambling; for example, a large wager can be placed on a sporting event in a short time and online poker can be played for hours for very small amounts of money.

With iGaming, this data can be accurately captured and analyzed providing detailed individual and community insights to further guide effective company interventions and State policy on this often-vexing topic.

Researchers around the world, including our team at UNLV's International Gaming Institute, are striving to find the keys to understanding the best use of this data to inform player protection and responsible gaming policies and programs, and are closing in on providing the necessary insights, and data from online gambling is crucial in this effort.

Thank you for the opportunity to testify on this important topic. I am happy to answer any questions the Chair or Committee members may have.

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