



OFFICE OF THE GOVERNOR

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BILL ANOATUBBY

GOVERNOR

July 16, 2012

Ms. Tracie Stevens, Chairwoman
National Indian Gaming Commission
1441 L Street N.W., Suite 9100
Washington, DC 20005

Dear Chairwoman Stevens:

The Chickasaw Nation respectfully submits this letter requesting that the National Indian Gaming Commission (NIGC) extend the public comment period for the above-referenced proposed rule. 77 Fed. Reg. 32465-32481 (June 1, 2012)

In the proposed rule, the NIGC is considering whether substantive changes to the grandfathering provisions are appropriate and, to that end, invites comments providing data and the factual basis for the changes being requested by tribal governments. The NIGC is also seeking responses to a series of questions relating to the specific impacts that the grandfathering provisions may have on tribal gaming operations, most of which will require an extensive data collection effort and analysis by various tribal departments and representatives. The proposed rule is thus requesting that tribal governments not only review and comment on the changes being proposed, but also compile and analyze complex data to demonstrate how their gaming operations will be affected by the proposed rule.

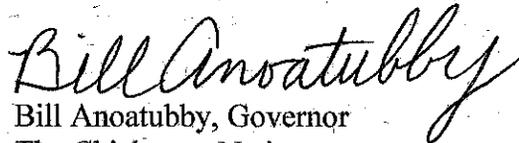
The Chickasaw Nation does not believe that a 60-day comment period is sufficient for tribal governments to accomplish these tasks. In light of the scope and complexity of the proposed rule, we are concerned that the existing deadline for comments will not provide sufficient time to perform the level of analyses that this proposed rule merits, or to achieve an adequate understanding of the implications and potential consequences of the grandfathering provisions.

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Furthermore, the 60-day comment period for the proposed rule coincides with the comment period for the proposed rule on the Class II Minimum Internal Control Standards (MICS), for which comments are also due on July 31, 2012. The process for commenting on the proposed Class II Technical Standards demands an extensive commitment of time and resources at a time when tribal governments are actively evaluating and commenting on another NIGC proposed rule with significant implications. The Chickasaw Nation strongly believes that additional time is needed to ensure that tribal governments will have sufficient time to develop meaningful and comprehensive comments on both the proposed Class II Technical Standards and Class II MICS.

For the reasons set forth above, the Chickasaw Nation respectfully requests that the NIGC grant a 30-day extension of the proposed rule's comment period. Such an extension will allow tribal governments to fully understand and evaluate the impact of the proposed rule without frustrating or unreasonably delaying the NIGC's objective of developing regulations that will best protect the security and integrity of tribal gaming operations.

Sincerely,



Bill Anoatubby, Governor
The Chickasaw Nation