

Comments on the  
Preliminary Draft of 518  
Self Regulation of Class II gaming  
September 14, 2011

Self Regulation of Class II Gaming:

- Menominee Tribe is very proud of the fact that we are one of two Tribes that received a certificate of Self Regulation from the National Indian Gaming Commission if not the first Tribe in the Nation. This date of our certificate is January 1, 2001.
- The self regulation process at that time was very intrusive but nonetheless we understand it was very much needed to ensure that all areas of self regulating a class II gaming facility were covered and it is what the Indian Gaming Regulatory Act required of class II gaming.
- Since this certificate is only for class II gaming, why does the process to become self regulated involve areas of class III gaming also?
- Section 518.7 (b) requires a “resume for all employees hired and licensed by the tribe subsequent to its receipt of a certificate of self-regulation...” Why is this going to be a requirement of self-regulation when NIGC receives all resumes immediately after licensing all primary management officials and key employees?
- There is a need for precise benefits that are associated with a self regulation certificate. At this time it’s unclear as to those benefits except for the small reduction in what is paid to NIGC for regulation class II gaming.
- One of the benefits could include an exemption from the facility license requirement.
- Self regulated Tribe’s should be consulted with directly as to the changes in the NIGC regulations.
- There needs to be an incentive for Tribes to want to attain a self regulation certificate and maybe the intent of that IGRA regulation has to be further researched.

In closing, I appreciate the National Indian Gaming Commission giving the Tribe’s the chance to make comments on the changes to the regulations that are being proposed.

Respectfully,

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Menominee Tribal Gaming Commission

C: Commissioners (5)  
MTL Tribal Chairman (1)