



Prairie Band Potawatomi Tribal Gaming Commission

August 15, 2011

Ms. Tracie L. Stevens, Chairwoman
National Indian Gaming Commission
1441 L St. NW, Suite 9100
Washington, DC 20005

Dear Chairwoman Stevens,

The Prairie Band Potawatomi Tribal Gaming Commission would like to take this opportunity to express our support for the positive efforts of the NIGC and the many Tribal representatives who have been involved in revising the current regulations. The Prairie Band Potawatomi Tribal Gaming Commission looks forward to being involved in this process through our attendance at the Consultation meeting being held on August 18th and 19th, 2011. We have been following the process and reviewing the preliminary draft changes to the current regulations. The Prairie Band Potawatomi Tribal Gaming Commission offers the following comments for discussion and review.

Part 514 - Fees

The Sample Worksheet for Computing and Reporting Annual Fees Payable to the NIGC Requires in the calculation to determine Gross Gaming Revenue a Description of the Game, the amount wagered less payouts to arrive at Net Win. This calculation is trackable for slots as the amount wagered is the coin in amount. For Table Games however, Casino's do not track the amount wagered but rather the Net win from each table is calculated by taking the Ending table inventory (Closer) - Fills + Credits – Beginning inventory(Opener) + Drop = Net Win.

The current worksheet format requires the amount wagered which is an untracked amount for Casinos. The suggestion from the Prairie Band Potawatomi Tribal Gaming Commission is that the NIGC annual fees payable worksheet be slightly modified to incorporate a separate section for Table Games win and Slot win outlining the two calculation methods to arrive at Net Win for the Calculation of Gross Gaming Revenue.

This change would not change the final amount of the calculation but would allow Casinos to accurately report the calculation of Net Win for Table Games without having to report the Drop figure in the amount wagered column.

Part 542 – Minimum Internal Control Standards for Class III Gaming

The Prairie Band Potawatomi Tribal Gaming Commission feels that the NIGC Minimum Internal Control Standards provide an important regulatory framework for our Commission to effectively implement and enforce a necessary internal control structure for the gaming operation. We support the notion that these standards be considered guidelines. The Commission also feels strongly that these Minimum Internal Control Standards be maintained and updated to incorporate changes in technology and/or other innovations which will provide an effective and efficient baseline for our internal control structure.

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Part 523 – Review and Approval of Existing Ordinances or Resolutions

As this regulation applies to existing ordinances in place prior to January 22, 1993 the Prairie Band Potawatomi Tribal Gaming Commission refrains from commenting on this section as it does not apply to the Prairie Band Potawatomi Nation - Title 12 Gaming Ordinance which was approved after January 22, 1993.

Part 559 – Facility License Notifications, Renewals and submissions

The Prairie Band Potawatomi Tribal Gaming Commission has reviewed the preliminary draft for this part and is in general agreement with the proposed changes. The Prairie Band Potawatomi Tribal Gaming Commission would suggest that Section 559.2 (b) be expanded to outline the procedures underlying the process for verifying Indian lands status. In addition, this section should include a description of the circumstances that would trigger the NIGC Chair to elect an extension of an additional 60 days for the NIGC to properly verify the Indian lands status. These circumstances should be as inclusive as possible to offer a guideline for Tribes to expedite the process without the extension coming into play.

In closing, we would like to express our appreciation to the National Indian Gaming Commission for providing this forum for discussion and look forward to working with you as well as other Tribal representatives involved in this process.

Sincerely,



Gary Mitchell, Chairman



Larry Mzhickteno, Vice-Chairman



Calvin Evans, Treasurer



Rey Kitchkumme, Secretary