

**BARONA GAMING
COMMISSION**

June 28, 2017

NIGC

Attn. Vannice Doulou
1849 C St. NW
Mailstop #1621
Washington, DC 20240

RE. Class III MICS Draft Guidance

Dear Ms. Doulou:

I am Chairman of the Barona Gaming Commission. We reviewed the Class III MICS draft guidance and offer the following comments.

The “Definitions” section has been removed from the Draft MICS and needs to be replaced and updated for clarification. We noticed some changes in terminology, i.e. “employee” and “personnel” have been changed to “Agent” which is currently used in the Class II MICS, but the Class III guidance does not include a definition of “Agent” In addition, §4(e) references “components” This word is not defined so we are unclear as to its application.

§4 Gaming Machines: This section is confusing. It looks like you tried to make the Class III MICS follow the Class II MICS, however, this doesn’t work since the methodology of the games is not the same. More specifically, use of the word “prize” instead of “jackpot” is confusing when referring to a Class III Gaming Machine. “Prize” is used in Bingo and other Class II games but gaming machines have “jackpots”, “hand pays”, “short pays” and “accumulated credit” payouts. In sections that were copied directly from the current MICS, “jackpots” is used rather than “award”

We would prefer to see the current 542.13(d) *standards used for jackpot payouts, fills, short pays, and accumulated credit payouts* in its entirety instead of the proposed changes to this section.

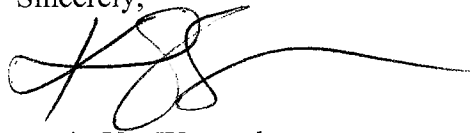
In addition, there is a typo in §4(a) regarding supervision. The document refers to “table games operations” rather than gaming machines.

§ 21 Drop and Count – “Bill acceptor canister” was replaced with “financial instrument storage component” which is a Class II term defined as “any component that stores financial

instruments, such as a drop box, but typically used in connection with player interfaces.” We believe the term “bill acceptor canister” is more appropriate for Class III machines.

As a California tribe, the NIGC MICS, and any subsequent amendments, are referenced in our compact with the state. This is therefore a very important topic for us. We appreciate the opportunity to comment on the proposed guidance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin VanWanseele', with a long horizontal flourish extending to the right.

Kevin VanWanseele
Chairman