

# The SHOSHONE-BANNOCK TRIBES



FORT HALL INDIAN RESERVATION

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GAMING COMMISSION

P.O. BOX 306

FORT HALL, IDAHO 83203

May 31, 2017

Jonodev Oselola Chaudhurt, Chairman  
National Indian Gaming Commission  
1441 L Street NW, Suite 9100  
Washington, DC 20005

Subject: NIGC Grandfather Class II Gaming System Sunset Provision

Dear Mr. Chaudhurt:

The Shoshone-Bannock Gaming Commission of Fort Hall, ID submits the attachment regarding the NIGC Grandfather Class II Gaming System Sunset Provision of 25 C.F.R. Part 547.

If you have any questions, please feel free to contact our office at (208) 237-8774, ext. 3015.

Sincerely,

Clinton Plenty wounds, Chairman  
Shoshone-Bannock Gaming Commission

File

Attachment

Cc: FHBC

## *25 C.F.R. Part 547 Grandfathered Class II Gaming Systems*

*May 31, 2017*

Thank you Mr. Chairman and Members of the Commission for the opportunity to make oral and written testimony during the consultation hearing in Portland, Oregon on May 25, 2017. The Shoshone-Bannock Gaming Commission replies to 25 CFR Part 547 the Grandfathered Class II Gaming System. The National Indian Gaming Commission seeks comments to the following questions: (1) any information related to the steps tribes have taken to comply with the grandfathering provision and any difficulties in implementing those provisions; (2) what risks, if any, the grandfathered games may pose to a gaming operation or the gaming public; (3) how those risks may be mitigated by means other than Part 547; and (4) what impacts, if any will the November 10, 2018 deadline have on your operation?

Whereas the Grandfathered gaming systems of any Class II gaming system manufactured before November 10, 2008, that is not already certified pursuant to this sub-section or compliant with paragraph (c) of this section may be made available for use at any tribal gaming operation providing compliance are approved.

However, Shoshone-Bannock Gaming cannot submit for an operation system because it does not have class II gaming devices. Bingo systems are govern by a contract vendor providing their own server system and equipment. Tracking of financial records are thru the internal financial system for accountability. The Shoshone-Bannock Gaming Commission is not in a position to submit the Class II gaming system software that affects the play of the Class II games, together with the signature verification required by §547.8(f) to a testing laboratory recognized pursuant to paragraph (f) of this section within 120 days after October 22, 2012.

The Shoshone-Bannock Gaming does not have class II gaming devices at any of the three casinos on the Fort Hall Reservation, Idaho.

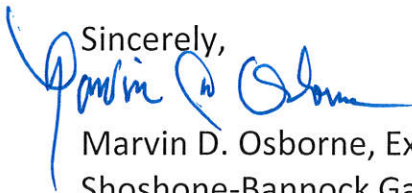
No testing laboratory tests have been conducted by Shoshone-Bannock Gaming and no risk are involved for the submission to the standards established by §547.8(b), §547.8(f), §547.14, and any additional technical standards adopted by the Shoshone-Bannock Gaming Commission other than the Tribal Internal Control System and internal regulatory requirements of the Shoshone-Bannock Gaming Commission are in place at this time.

The Shoshone-Bannock Gaming Commission do not conduct any class II gaming system devices and equipment on the Fort Hall Reservation, Idaho. If we have over looked any criteria that may change our view to class II gaming in the near

future, the Shoshone-Bannock Gaming would certainly not want to close its doors to class II gaming devices, we would allow the opportunity to explore the opportunity if the economic condition are certain to conduct class II gaming on the Fort Hall Reservation. As of now, there is no attraction to class II gaming here at the Shoshone-Bannock Gaming.

If there are any questions, please contact our office 208-237-8774, extension 3025. Thank you for the opportunity to comment on the regulations and how the standards apply on the Fort Hall Reservation, Idaho.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marvin D. Osborne". The signature is written in a cursive style with a large initial "M".

Marvin D. Osborne, Executive Director  
Shoshone-Bannock Gaming Commission  
Cc: file