



November 13, 2017

Jonodev Osceola Chaudhuri, Chairman
Kathryn Isom-Clause, Vice Chair
E. Sequoyah Simermeyer, Associate Commissioner
National Indian Gaming Commission
90 K Street, NE, Suite 200
Washington, D.C. 20002

RE: Proposed rule – 25 CFR Part 547, Sunset Provision Elimination

Dear Commission:

VGT, an Aristocrat Company, is a developer and manufacturer of Class II gaming systems that operate pursuant to and in accordance with National Indian Gaming Commission's (NIGC) rules and regulations. VGT is supportive of the NIGC proposed rule of 25 C.F.R. § 547.5, as published in the Federal Register on September 28, 2017 that would amend the requirement that grandfathered systems meet the standard adopted on September 14, 2012. We believe the current rule places an unfair burden on tribal operators and it should be amended.

We work diligently with tribal regulators and at great expense to meet all requirements as set forth in the Indian Gaming Regulatory Act and NIGC regulations. NIGC technical standards have proven to be a successful mechanism to raise the bar for Class II gaming systems. All systems developed after 2008 meet current standards and there have been continual improvements to those grandfathered systems since adoption of the 2008 technical standard.

VGT supports the proposed regulation change and applauds the Commission for recognizing the serious implications to tribal reservation economic development that could occur if no action is taken. Please let us know if we can provide additional supporting information.

Regards,

A handwritten signature in blue ink, appearing to read 'Jay Sevigny', is written over a light blue circular stamp.

Jay Sevigny
President, Corporate

JS:lpc