



THE SUQUAMISH TRIBE
OFFICE OF TRIBAL COUNCIL
LEONARD FORSMAN, CHAIRMAN

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National Indian Gaming Commission
1849 C Street NW
MS 1621
Washington, DC 20240

July 9, 2018

Re: Comments on Proposed amendments to 25 CFR 543.

The Suquamish Tribe of the Port Madison Indian Reservation submits the following brief comments regarding the NIGC's proposed amendments to 25 CFR 543:

1. 543.17(d)(7)(j) Controlled Keys- Generally, the Suquamish Tribe understands that sensitive keys need to be strictly controlled, there needs to be a balance between security concerns and operational functionality. Overly burdensome key process causes unnecessary delay frustrating customers and the efficiency of the operation.
2. 543.17(d)(4) As written, it appears that the very employees responsible for count and drop duties will not have custody of the required keys. This will make their task impossible. In addition, 543.17(d)(6) seems to be in conflict with the restrictions of (4). The entire key control process needs clarification. As currently written, the key control section has provisions which appear to be in conflict with each other. Clarification of this section will prove useful to regulators, auditors, and operators.

Sincerely,

Leonard Forsman
Chairman
Suquamish Tribe