



PUEBLO OF ISLETA

P. O. BOX 1270, ISLETA, NM 87022

July 9, 2018

Via email: 543_comments@nigc.gov

Chairman Jonodev O. Chaudhuri
National Indian Gaming Commission
1849 C Street NW, MS 1621
Washington, DC 20240

Re: Pueblo of Isleta Comments - Proposed Revisions to 25 CFR 543

Dear Chairman Chaudhuri,

Thank you for the opportunity to comment on the proposed revisions to 25 CFR 543. The Pueblo of Isleta hereby submits the following comments and questions:

Section 543.17(j)(1)(i-iv).

It is our understating that this section applies to all Class II games, including card games and bingo, as well as kiosks. However, in this part, "For kiosks" is proposed to be removed. Is the intent here to have this section only apply to card games?

If that is not the intent, we recommend revising the definition of "Drop box" in section 543.2 to remove the phrase "typically used in card games." If that phrase is removed, then that part would be inclusive of financial instrument storage components, which is the language used in the Drop and Count Standards.

Is the proposed section 543.17(j)(1)(ii) and (iii) supposed to be all encompassing for card games, bingo and kiosks (and is that the reason the current section 543.17(j)(1)(v) and (vi) removing "Kiosk release keys" and "kiosk content keys" is proposed)?

Additionally, Drop cabinet is not defined in the 543.2 standards. That definition is included in the 542.2 standards, which are now obsolete.

Section 543.17(j)(4).

Again, it is our understating that this section applies card games, bingo, and kiosks. Because Security typically maintains all the drop and count keys, this proposed section would make it difficult for Security to help with an emergency drop or anytime access to the bill cassette is needed because Security maintains the keys. Emergency drops are not rare because they occur due to a full canister, a problem with a cassette, a guest dispute or bill jams. This language would now prohibit a Security Officer from serving as one of the drop agents.



Section 543.17(j)(7).

What is the intent of this statement? It is unclear if this is intended to address situations that require immediate access as described above.

Section 543.17(j)(8).

Is this inclusive of a manual controlled key box as opposed an electronic key box or both? What is the intent of emergency manual keys? Does removal of the player interface drop and count still need to meet the requirements set forth under the regularly scheduled drop and count in addition to these requirements (such as section 543.17(e)(4))?

Section 543.17(j)(8)(i)

Does this also apply to the financial instrument storage components and drop box?

Feel free to contact the Pueblo of Isleta Gaming Regulatory Agency at 505-244-8139 if any clarification is needed on the comments and questions outlined above.

Sincerely,

PUEBLO OF ISLETA



J. Robert Benavides
Governor

cc: Georgene Louis, Executive Director, Pueblo of Isleta Gaming Regulatory Agency

