

NATIONAL INDIAN GAMING COMMISSION

REGULATORY REVIEW

Chandler, Arizona

June 27, 2012

8:55 a.m.

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REPORTED BY:

Cindy Bachman

Certified Reporter No. 50763

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THE NATIONAL INDIAN GAMING COMMISSION,  
REGULATORY REVIEW, taken on June 27, 2012, commencing  
at 8:55 a.m. at the WILD HORSE PASS CASINO HOTEL,  
5040 Wild Horse Pass Boulevard, Chandler, Arizona,  
before CINDY BACHMAN, Arizona Certified Court Reporter,  
in and for the State of Arizona.

COMMITTEE MEMBERS PRESENT

- Tracie Stevens, Chairwoman
- Daniel Little, Associate Commissioner
- Paxton Myers, Chief of Staff
- Michael Hoenig, Senior Staff Attorney
- Jennifer Ward, Staff Attorney
  
- Nimish Purohit, Gaming Technology Liasion
  
- R. Rest West, Senior Auditor
  
- Lance Vallo, Acting Regional Director
  
- Emily Molina, Administrative Assistant
  
- Tim Russ, Compliance Officer
  
- Patricia Beckman, Compliance Officer

1 (The meeting commenced at 8:55 a.m.)

2 \* \* \* \* \*

3 CHAIRWOMAN STEVENS: Good morning, everyone.  
4 My name is Tracie Stevens, and I'm the Chairperson at  
5 NIGC.

6 I'd like to turn this over to have our host  
7 here from the Gila River Indian Community,  
8 Governor Mendoza, open up our consultation, and we'll  
9 proceed from there.

10 Governor?

11 GOVERNOR MENDOZA: Good morning and welcome.

12 I just returned from New York City, so if look  
13 really tired, it's because I've been traveling a lot.  
14 But, again, with my position, it's been a whirlwind  
15 since my oath of office on January 1st of this year.

16 So, again, on behalf of the Akimel O'Odham and  
17 the Pee Posh people of the Gila River Community,  
18 welcome.

19 I have another event just on the other side of  
20 the wall here, so it is a good, busy morning for me  
21 already.

22 But, again, I want to welcome you to our  
23 community. We are very delighted to welcome the  
24 Honorable Tracie Stevens, Chairperson for the National  
25 Indian Gaming Commission, and Commissioner

1 Daniel Little. Welcome. And I hope you have a very  
2 productive meeting today. I believe we'll meet  
3 tomorrow as well.

4 For those tribal leaders that are here with us  
5 this morning and have traveled many miles, welcome.  
6 And we hope that your stay is good.

7 We know it's hot, but we like it here.  
8 It's dry. We hope that this facility is able to  
9 accommodate you because there's a lot of activity in  
10 this area.

11 If you'll notice, this whole area, which we  
12 refer to as the northern corridor of our community,  
13 which is the northern boundary of the Gila River Indian  
14 Community, resides in my home district.

15 Gila River is comprised of seven districts, and  
16 you're in District 4, where I come from.

17 And, again, a lot of the facilities you see  
18 around here are for economic development purposes.  
19 On the other side of the freeway is industrial  
20 development. So on the other side of the freeway, we  
21 have over 40 businesses, corporations -- industrial  
22 development, corporations, and businesses.

23 On this side of the freeway, we have a lot of  
24 the other ventures of the community, of course, our  
25 casino hotel, our Sheraton Wild Horse Pass Resort.

1           We have two golf courses on this side. We have  
2 Rawhide. And we even have a spa. I know the ladies  
3 love spas. We have a wonderful spa here, so please  
4 take advantage.

5           Again, the ancestral names for our people are  
6 the Akimel O'Odham and the Pee Posh people. We're the  
7 people of the river, and we have resided along the  
8 river banks of the community from time in memorial.

9           The river has been the center of our social,  
10 economic, cultural, and spiritual existence of our  
11 people. And when the federal government damned the  
12 Gila River upstream and the river stopped flowing  
13 across our land, our people were decimated.

14           We have fought many years to reclaim our water  
15 of our community. And in 2004, our community was very  
16 successful in getting the Congress to enact the Gila  
17 River Indian Community Water Settlement Act.

18           So when our community began to experience the  
19 degree of prosperity with gaming, we re-created the  
20 Gila River to demonstrate to our visitors, to our  
21 community, the importance of the river to our people  
22 and to our young people.

23           Today with me is one of my interns. And I'm  
24 going to have her stand. Her name is Lisa Hendrix.  
25 She's one of our executive office interns. She's

1 actually the president of our Youth Council.

2 So she's going to be following me around, and  
3 she's going to be learning as much as possible about my  
4 job. She'll eventually take over my job.

5 Thank you, Lisa.

6 But the restoration of the Gila River reflects  
7 a new and growing prosperity for our people. We are  
8 beginning to take, to restore, and to diversify our  
9 economic economy to increase the educational and  
10 professional opportunities for our people.

11 You know, we have wonderful programs,  
12 scholarship programs, for our people, and Lisa is in  
13 her second year in college. She'll be ready to  
14 transfer to Arizona State University very soon.

15 Lisa, is that right?

16 And I believe she may be considering political  
17 science as a major. Again, providing those  
18 opportunities for our young people is very important.

19 We have a long way to go to address the  
20 generations of neglect and deprivation that resulted  
21 from the loss of our river.

22 You know, the river was everything to our  
23 people. It was the bloodline to our culture. So when  
24 that water was damned by the federal government, we  
25 believe a part of us went away.

1           But I'm pleased to say that this generation of  
2 community members will have every opportunity to pursue  
3 their educational and professional dreams, as we  
4 provide opportunities, not only for Lisa and our young  
5 people, but other members of our community.

6           With regard to today's consultation, I would  
7 like to make some comments regarding the consultation  
8 today. As you can see, the community is actively  
9 engaged in gaming, under the authority of the Indian  
10 Gaming Regulatory Act.

11           The NIGC is here to receive comments and engage  
12 in consultation on the proposed Part 543 - Minimum  
13 Internal Controls Standards for Class II Gaming and  
14 proposed Part 547 - Minimum Technical Standards for  
15 Gaming Equipment Used With the Play of Class II Games.

16           We know that tribal leaders from interested  
17 gaming tribes and the NIGC have struggled for a number  
18 of years to adopt a fair set of Class II technical  
19 standards.

20           To the NIGC's credit, they have given this  
21 topic a great deal of attention, and we thank that,  
22 Chairwoman Stevens.

23           In the end, we urge the NIGC to allow tribes to  
24 operate commercially viable Class II gaming, as was the  
25 clear intent of Congress when they adopted the

1 Indian Regulatory Gaming Act.

2 Class II gaming is not a big part of the  
3 community's operation because our compact counts  
4 Class II gaming against the machine caps for Class III  
5 gaming.

6 The big issue in Arizona for tribes is off  
7 reservation gaming, which now threatens to under the  
8 carefully negotiated balance reached, if the voters  
9 adopt Proposition 202, among Arizona tribes and the  
10 State of Arizona.

11 We trust, however, that the tribes represented  
12 today will advise the NIGC of their interest and their  
13 concerns with the proposed Part 543 and Part 547  
14 regulations.

15 The area in which I mentioned is very important  
16 to our community, and that is the Wild Horse Pass.  
17 You are in the area of our reservation, known as the  
18 Wild Horse Pass.

19 Throughout this area, wild horses have roamed,  
20 following the water along the Gila floodway to the  
21 river.

22 In fact, when our community first started  
23 construction of the Sheraton Wild Horse Pass and Resort  
24 and Spa, our construction crews staked out construction  
25 sites. Each morning our crews came back, only to find



1 all the staked pulled out.

2 Our crews went through this exercise every day  
3 for a week. We suspected that we were the victims of  
4 youthful pranks and vandals. It wasn't until our  
5 project construction manager filmed the culprits, and  
6 we learned the truth of this area.

7 It turns out that each night a local herd of  
8 wild horses pulled out the stakes for the construction  
9 site. In fact, we still use this footage as part of  
10 our marketing materials for the Wild Horse Pass.

11 Depending on the time of the year, you can see  
12 the local wild horses roaming this area. They have  
13 been known to frequent the 17th fairway of Whirlwind  
14 Golf Club. So, again, this is a very important area to  
15 us.

16 And, in closing, during your stay in our  
17 community and after your meetings have concluded,  
18 I invite you, personally, to enjoy the Wild Horse Pass,  
19 our casino, our spa, our Rawhide, and other areas here,  
20 our golf courses.

21 But, again, take advantage of the opportunity.  
22 If you want to contribute next door, that would be  
23 helpful as well.

24 So, again, welcome to our community. Welcome  
25 to the Gila River Indian Community. And we hope today

1 is a very productive one. Thank you.

2 (Applause.)

3 CHAIRWOMAN STEVENS: Thank you, Governor.

4 I know he has a very busy schedule. And we  
5 thank the Gila River Indian Community for opening their  
6 territory to us and welcoming us.

7 Before we proceed, I just want to give a few  
8 minutes for folks who may still be coming in. We  
9 started a little earlier than usual, so we might give  
10 them about five minutes, if everybody can hang with us.  
11 And we'll resume again in about five minutes.

12 We have people coming in that are still  
13 registered. So just five more minutes, and then we'll  
14 continue with this morning's consultation meeting.

15 Thank you.

16 (A recess was taken from 9:09 a.m. to  
17 9:19 a.m.)

18 CHAIRWOMAN STEVENS: Good morning again for  
19 anyone who wasn't in the room earlier today.

20 In front of you, you will have a couple of  
21 items. One is the agenda, a one-pager, and also the  
22 PowerPoint so that you can follow along or if you need  
23 to take any notes.

24 We've already had our introduction from  
25 Governor Mendoza of the Gila River Indian Community.

1           What we'd like to do next is, if we could,  
2 please, do some introductions of the attendees that are  
3 here.

4           Do we have any tribal leaders here?  
5 You're welcome to join us at the table, if you'd like,  
6 but we understand if you'd like to stay back there.  
7 We do reserve the table for tribal leaders or their  
8 appointed designees, as they see fit.

9           And with that, we'll start over here, and we'll  
10 go left to right. If you could state your name, your  
11 title, and the tribe that you're with.

12           MR. BONNAHA: Hello, everybody. My name is  
13 Charles Bonnaha. I'm with the Yavapai-Apache Nation,  
14 and I'm a commissioner.

15           MR. NANTY: Welcome to Arizona. Hubert Nanty,  
16 Tonto-Apache Tribe.

17           MR. LESLIE: Good morning, everybody.

18           I'm Roger Leslie. I'm a White Mountain Apache  
19 Tribal member. I work for San Felipe Pueblo in  
20 New Mexico. I am the executive director of their  
21 Gaming Commission, as well as the chairperson of the  
22 New Mexico Association of Indian Gaming Commissioners.

23           MS. WELSH-TAHBO: Good morning, everybody.

24           My name is Valerie Welsh-Tahbo. I'm from  
25 Parker, Arizona, about three hours west of here.

1 The Colorado River Indian Tribes and a councilwoman.

2 MS. CHINO: Good morning. Carleen Chino,  
3 Navajo Nation. I'm the executive director for the  
4 Navajo Gaming Regulatory Office.

5 MS. BAKER: Hello. My name is Linda Baker.  
6 I'm from the Southern Ute Indian Tribe in  
7 Ignacio, Colorado, and I'm a gaming commissioner.

8 MS. TAYLOR: Good morning. My name is  
9 Andrea Taylor. I'm also from the Southern Ute Indian  
10 Tribe. I'm vice-chair gaming commissioner.

11 MS. JONES: Good morning. My name is  
12 Julia Jones. I'm from the Gila River Indian Community.  
13 I am the assistant regulatory compliance officer for  
14 Gila River.

15 MR. STONE: Good morning. My name is  
16 Art Stone. I'm chairman of the gaming commission,  
17 Tonto-Apache.

18 MR. WILK: Good morning. I'm Don Wilk, and  
19 I'm Tonto-Apache, too.

20 MS. WILLIAMS: Good morning.

21 I'm Carol Williams, and I'm the chairperson for  
22 the Yavapai-Apache Gaming Commission.

23 MS. HUGES: My name is Jennifer Huges.  
24 I'm with Hobbs Straus Dean & Walker. And I was  
25 actually asked to come for the Seminole Tribe of

1 Florida.

2 MR. NICHOLS: Good morning. My name is  
3 Jason Nichols. I'm the deputy director for Arizona  
4 Indian Gaming Association.

5 MS. CARRILLO: Good morning. My name is  
6 Carol Carrillo. I'm the executive director for  
7 Yavapai-Apache.

8 MR. ANZALONE: Good morning.

9 I'm Don Anzalone. I'm the compliance manager  
10 for the Yavapai-Apache Gaming.

11 MS. GONZALEZ: Good morning. My name is  
12 Melissa Gonzalez, and I'm machine compliance,  
13 Yavapai-Apache Nation.

14 MS. WILSON: Good morning. Sylvia Wilson with  
15 the Yavapai-Apache Gaming Commission.

16 MS. HOMER: Good morning.

17 Elizabeth Lohah-Homer. I'm with Homer Law in  
18 Washington, DC. I'm here today on behalf of a number  
19 of my tribal clients, as well as the National Indian  
20 Gaming Association.

21 MS. POUST: Good morning. Teri Poubst.  
22 And I'm also an attorney in private practice, here  
23 today on behalf of the Pechanga Band, as well as my  
24 tribe, Poarch Creek.

25 MR. MAGEE: Good morning. John Magee. I'm a

1 gaming commissioner for the Pechanga Band of Luiseno  
2 Indians.

3 MS. CORNEJO: Good morning. Ursula Cornejo,  
4 a Pechanga gaming commissioner.

5 MS. OGAS: Good morning. Kathryn Ogas on  
6 behalf of the Grand Jury of California.

7 MR. BERGER: Good morning. I'm Charlie Berger  
8 with the Osage Nation in Oklahoma, director of  
9 Regulatory Compliance and Audit.

10 MS. BANALY: Good morning. I'm Deandra Banaly,  
11 an assistant general counsel on behalf of the  
12 Ft. McDowell Yavapai Nation.

13 MS. ROLAND: Good morning. My name is  
14 Melinda Roland, and I'm an investigator for  
15 Tonto-Apache.

16 MS. YAO: Good morning. Fei Yao, Tonto-Apache.

17 MS. SMITH: Good morning. I'm Tashina Smith  
18 with Tonto-Apache, internal auditor.

19 CHAIRWOMAN STEVENS: Okay. Thank you everyone  
20 for introducing yourself.

21 And what I'd like to do now is if we can have  
22 the staff, starting -- oh, I'm sorry. There's one  
23 more. We're going to have you introduce yourself and  
24 put you on the spot.

25 MR. SANDERSON: Good morning. My name is

1 Scott Sanderson. I'm the deputy director for the  
2 Gaming Commission here at Gila River.

3 I'd like to welcome you all here today, and  
4 it's a pleasure to have you.

5 CHAIRWOMAN STEVENS: Thank you.

6 So we'll start over here with Rest, if you can  
7 introduce yourself.

8 MR. WEST: Rest West, senior auditor with NIGC.

9 CHAIRWOMAN STEVENS: And I'm going to apply the  
10 microphone rules to you as well.

11 MR. WEST: Okay. Rest West. I'm a senior  
12 auditor with the National Indian Gaming Commission.

13 MR. PUROHIT: Hello, everyone. Nimish Purohit.  
14 I'm the acting director of training and technical  
15 assistance, as well as the gaming technology liaison  
16 for the Commission.

17 MR. HOENIG: Good morning. I'm Michael Hoenig.  
18 I'm a senior attorney with the Office of General  
19 Counsel.

20 MS. WARD: And I'm Jennifer Ward. I'm an  
21 attorney with the Office of General Counsel as well.

22 MR. VALLO: Good morning, everybody.

23 I'm Lance Vallo, the acting region director  
24 here in the Phoenix region. Good morning.

25 MR. RUSS: Good morning. Tim Russ. I'm one of

1 the new compliance officers based here in the Phoenix  
2 region. It's great to be here today.

3 CHAIRWOMAN STEVENS: We also have Patricia in  
4 the back. She's also a new compliance officer that has  
5 recently joined us.

6 I think you recently went on a tour to  
7 introduce our two new staff to the region.

8 And I also want to note that we have  
9 Emily Molina, who is outside -- we don't need to bring  
10 them in. You all may know them if you have interaction  
11 with the region.

12 And is Sally here?

13 MR. VALLO: No, she's on vacation.

14 CHAIRWOMAN STEVENS: No, I didn't see Sally  
15 here.

16 So that's our staff. I just want to say thanks  
17 to our regional staff and all the staff that support  
18 the NIGC endeavors, in working with the tribes directly  
19 and helping us with our objectives here.

20 We certainly couldn't do it without the hard  
21 work of our staff that we have here, that have  
22 introduced themselves, and many more that we don't see  
23 here who are behind the scenes.

24 Next, I want to start down on the end here with  
25 our chief of staff.



1 MR. MYERS: Good morning. My name is  
2 Paxton Myers, Chief of Staff, National Indian Gaming  
3 Commissioner. I'm also a member of the Eastern Band of  
4 Cherokee Indians from North Carolina.

5 CHAIRWOMAN STEVENS: Okay. And go ahead, Dan.

6 COMMISSIONER LITTLE: Hello. Good morning,  
7 everyone. My name is Dan Little. I'm the Associate  
8 Commissioner with the NIGC.

9 I want to welcome you all today, and thank you  
10 all for attending. In going around the room, listening  
11 to all the tribes represented, many of you have  
12 traveled great distances, and I'm very honored to have  
13 you in our presence today. So thank you very much.

14 CHAIRWOMAN STEVENS: Also I want to note that  
15 Vice Chairwoman Steffani Cochran is not with us today.  
16 She's back in the DC office. She's also a member of  
17 the Chickasaw Nation, out of Oklahoma.

18 We, as three Commissioners, do a little tag  
19 team. So sometimes you'll see all three of us, and  
20 sometimes you'll only see one of us or a combination of  
21 the three of us.

22 So she's off this week. She'll be back at the  
23 next one. And I'm sure she sends her well wishes.

24 My name is Tracie Stevens. I'm a member of the  
25 Tulalip Tribes, out of Washington State, and I'm the

1 Chairwoman of the National Indian Gaming Commission.

2 We'll go ahead and get started. Again, if you  
3 look at your agenda, it will follow along. As noted at  
4 the bottom, we may have to take things out of order or  
5 things may go quicker or slower, depending on the  
6 interactions and comments that may occur here today.

7 So this morning, as noted here, we're doing  
8 some of the introductions. We'll move on to Part 547  
9 in the morning. We'll continue that in the afternoon,  
10 if we need to, followed by Part 543.

11 One thing to note that we do in these meetings.  
12 We do have a schedule here, just so everyone knows  
13 beforehand what the plan is, should anyone need to time  
14 their attendance here.

15 But we always welcome, and are open to, tribal  
16 statements or statements from tribes read to the record  
17 or commented during this process.

18 We understand that many of you have a lot of  
19 other things, including your normal job, or council  
20 members who have many other issues that they have to  
21 deal with. And so your time may be limited.

22 So, periodically, we will open the floor to  
23 anyone who wants to make comments, whether it's for  
24 that particular topic we're on or for the whole day,  
25 should your schedule require that you be somewhere

1 else.

2 So at this time, we'd like to open it up to  
3 anyone who needs to make comments to the record.

4 (No response.)

5 CHAIRWOMAN STEVENS: Okay. Then we'll go ahead  
6 and get started on the 9:15 section, which is Group 3,  
7 Part 547. You can follow along on your PowerPoint.

8 You'll see various people taking different  
9 parts of the PowerPoint, between the Commissioners and  
10 our staff. And when we get to a certain section, we'll  
11 open it up for comments, questions, and we'll note that  
12 as we go along.

13 So tribal consultation -- we put this out  
14 front, and we like to remind everybody that tribal  
15 consultations are between tribal governments and the  
16 federal government. Only tribes and their designees  
17 may attend and participate in these meetings. These  
18 meetings are not open to the public, and certainly not  
19 to the press.

20 In regard to "Executive Order 13175,  
21 Consultation and Coordination with Indian Tribal  
22 Governments," in Section 3, Policymaking Criteria (c),  
23 what we like to do, and in following along with the  
24 Executive Order, is talking to tribes and discussing  
25 with tribes our intent with federal standards.

1           Or if we need to make any changes, that we need  
2 to do that beforehand and before we start a official  
3 rulemaking process.

4           We've done that -- it's been two years -- since  
5 we started down this road, and we appreciate everybody  
6 coming along with us on this journey of talking about  
7 what regulations were a priority or are priorities for  
8 tribes, to address and update.

9           We were able to put a list together. Everyone  
10 participated in that, and we appreciate that.

11           And for today's discussion, and has been the  
12 practice of the Commission with all the other  
13 regulations that we've gone through, based on input  
14 that we receive from tribes, we developed discussion  
15 drafts.

16           And this is all prior to the official  
17 rulemaking process, part of this section here, of the  
18 Executive Order. Prior to making changes, we discuss  
19 them with tribes first.

20           So we've done the discussion draft. The recent  
21 proposal rules are based largely on that draft, but  
22 also we incorporated changes and comments that were  
23 suggested to us by tribes during that informal  
24 discussion draft phase.

25           So this is all meeting that part of the

1 Executive Order, and what we think is the best way to  
2 go about it.

3 So our commitment is that we have a clear and  
4 transparent process -- again, that process that I just  
5 described -- so that there are no surprises, that we're  
6 aware of what we're doing. And then tribes have an  
7 opportunity to weigh in and provide input, which in  
8 much of this process, we have found to be very helpful  
9 in prorogating regulations.

10 All of our consultations are transcribed.  
11 This lovely lady over here is transcribing these as we  
12 go. These are posted. These transcripts, and also any  
13 written comments that we receive, are posted on our  
14 website.

15 Every comment that we receive is reviewed and  
16 considered. And any proposed or final rule will  
17 include a summary of these comments. And you'll see  
18 that in the rules that we'll be discussing today.

19 We received a number of comments from the  
20 discussion draft, and those were summarized in the  
21 proposed rule.

22 So with that, I'll turn it over to Dan, and  
23 we'll continue on with the technical parts of the  
24 proposed rules.

25 COMMISSIONER LITTLE: Okay. Thank you,

1 Chairwoman.

2 Like she had just mentioned, we're very, very  
3 committed to a very open discussion and transparent  
4 process. We've been working on this for, like she  
5 said, a couple years now. And we feel we've come a  
6 long way, and the Commission has learned a lot.

7 I do want to point out that how we got to where  
8 we are within those proposed rulemaking was through  
9 tribal comments, but we also utilized the Tribal  
10 Advisory Committee.

11 And there's two members of the Tribal Advisory  
12 Committee that are in attendance today. John Mcgee  
13 from Paganda, which he introduced earlier, and then  
14 Tom Wilson from Pascua Yaqui. He actually had to step  
15 out for a few minutes.

16 But I want to recognize these two individuals,  
17 along with the entire TAC because it was a long,  
18 interesting process and a lot of time and dedicated  
19 energy and commitment from their tribes to help us get  
20 to where we are with the Notice of Proposed Rules.

21 So I want to thank them and the entire Travel  
22 Advisory Committee through the process.

23 Were there any other members of the Tribal  
24 Advisory Committee here?

25 MALE SPEAKER: Tribal Chief.

1           COMMISSIONER LITTLE: Oh, I'm sorry. I didn't  
2 see you there. Hello. My apologizes.

3           From Navajo, correct?

4           MALE SPEAKER: Yes.

5           COMMISSIONER LITTLE: Okay. I'm sorry. I  
6 didn't see you sitting there. Paxton was in my way.  
7 I'm going to blame it on the staff.

8           In any event, we've come a long way. And  
9 during the Tribal Advisory Committee, we discussed  
10 Part 547-the Minimum Technical Standards for Gaming  
11 Equipment Used With the Play of Class II Games, and  
12 then Part 543-Minimum Internal Control Standards for  
13 Class II Gaming.

14           The Tribal Advisory Committee provided us with  
15 some recommendations, which we took into account when  
16 we formulated the discussion draft, which then turned  
17 into the Notice of Proposed Rules.

18           So the proposed rule was, like I had said  
19 earlier, through consultations, meeting with tribes,  
20 utilizing the Executive Order 131751.

21           And what this Commission had heard from  
22 tribes -- and we all, in prior lives, worked for  
23 tribes, and we understand the challenges.

24           And the challenge that I always came up against  
25 with the National Gaming Commission, when I worked for

1 a tribe, was that the Commission often times would act  
2 without consulting the tribes.

3 And we committed early on that we were going to  
4 talk to the tribes prior to making any decisions.  
5 There would be no Notice of Proposed Rules that came  
6 out of the blue, that tribes did not hear about.

7 In our regulatory review process, if you look  
8 back, we actually put out a website discussion drafts  
9 prior to going to a Notice of Proposed Rulemaking. And  
10 that's been very, very helpful.

11 So with Part 543 and Part 547, we did put  
12 discussion drafts up on the website, back on  
13 March 16th. And we opened up a 30-day comment period.  
14 And the Notice of Proposed Rules that are out right now  
15 are basically based upon those discussion drafts.

16 Many and most of the changes that were made  
17 from the discussion draft were from public comments  
18 that we did get from the tribes.

19 I do want to thank all the very thoughtful  
20 comments that we did receive from all the tribes that  
21 did send them in. There were many -- I think there  
22 were over 100 that were submitted. And they were very,  
23 very helpful. We learned a lot, and it gave us some  
24 direction in how we should move forward.

25 Once again, staying committed to Executive



1 Order 13175 and that listening to tribes, listening to  
2 concerns before moving forward with the rulemaking  
3 process.

4 So the discussion draft comment period ended on  
5 May 27th. We took those comments, and on June 1st, we  
6 published the Notice of Proposed Rulemaking for  
7 Part 543 and Part 547.

8 That comment period runs until July 31st, and I  
9 strongly urge everyone to submit comments, if you  
10 haven't already. They are all reviewed. They are all  
11 thoroughly reviewed by the Commission and read by the  
12 Commission and all of the staff. They're very, very  
13 helpful.

14 And I do want to -- and, once again, taking up  
15 my past working for a tribe, I remember the days when  
16 we would get form letters from NIDA and the different  
17 associates, and we'd kind of change our name and send  
18 them in.

19 And I was very, very pleased that we didn't see  
20 a lot of that during the discussion draft. The tribes  
21 spent a lot of time and a lot of energy to put in very  
22 thoughtful comments. And I do appreciate that because  
23 it was very helpful when we sat down with the staff and  
24 put together this proposed rule.

25 So, like I said, the comment period ends on the

1 31st.

2 We'll be doing additional consultations after  
3 the 4th of July in Sacramento and in the Seattle area.  
4 So if you want to attend additional consultations, that  
5 would be the time you could do so also.

6 And then one last thing. Obviously, I need to  
7 put some formal commissioners on the hot seat. We've  
8 got two formal NIGC commissioners in the audience  
9 today: former Vice-Chair Liz Homer and Associate  
10 Commissioner Teri Poust. So thanks for coming. It's  
11 always good to see you guys.

12 Other than that, I'm going to turn it over to  
13 Michael Hoening, who's going to start going through  
14 Part 547. If during this discussion, you have a  
15 comment, you don't have to wait until the end. You can  
16 raise your hand, a mic will be brought to you, and you  
17 can state your comment or ask your question.

18 So thank you.

19 MR. HOENIG: Okay. Thanks.

20 So like Commissioner Little just said, I'm  
21 going to go through 547. This is going to be a very  
22 general overview, just hitting the high points of some  
23 of the changes that were made from the discussion  
24 draft.

25 I encourage everybody to read the preamble that

1 was published with the Notice of Proposed Rulemaking.  
2 It gives a very thorough explanation of the reasons for  
3 some of the changes and a review of most of the  
4 comments we received. I think it's very helpful

5 It also asks for some additional information,  
6 which we'll talk about a little bit in the PowerPoint.  
7 Some questions out there for the Commission to consider  
8 as they start working on a final rule after the comment  
9 period closes.

10 So we'll just go ahead and get started with the  
11 proposed rule. Generally, the first big change is  
12 that, like with the discussion draft, the proposed rule  
13 reorganizes the first five sections.

14 547.1. Very brief, stays the same, sets out  
15 the purpose of the part.

16 547.2. We took the definitions section and  
17 moved it right up to the front. That seemed to make  
18 sense to us.

19 547.3 is now the implementation section

20 547.4 is the rules of the general application.

21 And then 547.5 kind of gets into the meat of  
22 the part with the general compliance section. And then  
23 within that, we reorganized some of the information,  
24 just for clarity and flow.

25 As we go through this, too, I'm going to have

1 Nimish here jump in, where appropriate, on some on the  
2 more technical things that he does a much better job  
3 than I do of explaining.

4 So I will ask him to take the first definition  
5 there, which is the definition of EPROM. We added the  
6 definition there based on the some of the comments we  
7 received.

8 MR. PUROHIT: The EPROM, everyone's probably  
9 familiar with it from their compacted gaming state,  
10 where it's the primary media. It stands for Erasable  
11 Programmable Read-Only Memory.

12 And the reason it was put in there is just so  
13 it gives flexibility to the Tribal Regulatory  
14 Authorities on what they can look out for when they're  
15 reviewing the actual equipment that comes in, on the  
16 Class II side.

17 COMMISSIONER LITTLE: Thanks, Nimish.

18 There is also a definition added for "Patron,"  
19 which was based on some comments we received.

20 Also based on comments to the discussion draft,  
21 we put in a definition for "Advertised top prize," a  
22 definition for "Audit mode" and "Enroll" and  
23 "Unenroll."

24 There was a definition for "Electrostatic  
25 discharge," which was dropped from the discussion

1 draft, I think, unintentionally. So that's been put  
2 back in, based on public comment.

3 The definition of "Electromagnetic  
4 interference" was also amended, not taken out or put  
5 in, but just changed, based on public comment.

6 The definition of "Proprietary Class II System  
7 Component." This was something that was added into the  
8 discussion draft. It was put in there to clarify some  
9 points, but I think it ended up creating some  
10 confusion.

11 So I'm going to let Nimish take this one as  
12 well, and kind of explain what the purpose was, and why  
13 we ended up just taking it out of the proposed rule.

14 MR. PUROHIT: Thanks, Mike.

15 The main purpose of inserting the "proprietary"  
16 word into the actual technical standard discussion  
17 draft was because, up from when the actual technical  
18 standards were passed and adopted in 2008, up until  
19 now, there have been several uncertainties about  
20 whether or not these technical standards also extended  
21 to the common back-of-the-house systems that you have,  
22 that are communicating with several Class II Systems.

23 And that is not the case. And that's the  
24 reason why this was added in, to make sure that if a  
25 Class II System offers its own player tracking and its

1 own ticketing system and all that, that's the only  
2 thing that's supposed to be tested through these  
3 technical standards, not the common back-of-the-house.

4 But because it created several pieces of  
5 confusion from it using the word "proprietary" and how  
6 it can be misconstrued as requiring someone to invest  
7 in Proprietary technology, it was removed from there.

8 And I think we're just going to end up  
9 strengthening the preamble going forward.

10 COMMISSIONER LITTLE: Thank you.

11 So to go along with that, the term  
12 "proprietary" was also taken out of the definitions of  
13 Cashless system and Voucher system.

14 And last for the definitions, carried over from  
15 the discussion draft, the definition of "agent" does  
16 not include computer systems.

17 So next is 547.3, which is, Who is responsible  
18 for implementing these standards?

19 This was moved up from 547.5 in the current  
20 published regulation -- the current regulation in  
21 effect. It still has language indicating that these  
22 are minimum standards, that Tribal Gaming Regulatory  
23 Authorities can implement stricter standards, if they  
24 wish.

25 There is no limitation on technology, and this

1 is not intended to limit technology within the Class II  
2 Gaming world.

3 Only applicable standards apply. That's still  
4 in there. And nothing here is intended to grant or  
5 change state's jurisdiction whatsoever.

6 Section 547.4. What are the rules of general  
7 application for this part?

8 This was moved from 547.5.

9 Fairness Standards are still there.

10 The first big change is -- this was in the  
11 discussion draft as well, and the comments were  
12 overwhelmingly supportive of the change, so we kept  
13 them in here, and that is to remove the minimum odds  
14 requirement.

15 So it used to be that minimum odds had to be  
16 1 in 100 million for a top prize. That's gone.  
17 As we'll see later in the PowerPoint presentation,  
18 there will be a new notification requirement to replace  
19 this. We'll get to that in just a few minutes.

20 The test labs have to calculate and/or verify  
21 the mathematical expectations, and those are reported  
22 to the TGRA, the results of that test. If the TGRA  
23 requests that, it can also get the mathematical  
24 expectations from the manufacturer so it can test it  
25 itself.

1           Just like before, all the gaming equipment and  
2 software has to be approved by the TGRA before it can  
3 be put on the gaming floor. And the equipment must  
4 perform according to the design and operating  
5 specifications.

6           So 547.5, How does a Tribal Government or TGRA  
7 comply with this part?

8           This is the section we definitely got the most  
9 comments about. This includes the grandfathering  
10 provisions. And that is Class II Games that did not  
11 meet the compliance standards of 547.5 at the time it  
12 was originally published in 2008 can be grandfathered  
13 in.

14           There is a set period of time that they had to  
15 be submitted for testing, and then there is a time by  
16 which all the games either have to be brought into  
17 compliance or removed from the floor.

18           So we made some changes to this in the  
19 discussion draft. The Commission had changed it to  
20 make it current with some other changes.

21           Based on all the comments that were received,  
22 the Commission has kind of reset it back to the way it  
23 was. So nothing has changed from the current published  
24 regulation.

25           There are some very small changes, just to make



1 sure that it doesn't actually conflict with any of the  
2 other changes throughout the regulation. But for the  
3 most part, it's back to exactly the way it was. And  
4 this was done so that the Commission could get some  
5 more information.

6 So just going through it, the Commission  
7 requests more information to make an informed decision  
8 on, how many Class II gaming systems will be affected  
9 if the current date of November 10, 2013 -- and that's  
10 the date by which all grandfathered machines would  
11 either have to be brought into compliance or removed  
12 from the floor -- if that is extended or eliminated?

13 What would be the regulatory and other impacts  
14 of extending the period by three to five years past  
15 this November 10, 2013 deadline, or just removing the  
16 time period so that a grandfathered system can just  
17 stay grandfathered until it broke down and needed to be  
18 taken off the floor?

19 Next, one of the other things that's being  
20 considered -- and this is in the preamble -- is setting  
21 a new time period for submission of machines to be  
22 grandfathered.

23 So if there's anything out there that didn't  
24 get submitted in that first 120-day period, it could be  
25 submitted now for grandfathering certification.

1           So one of the questions is, How many Class II  
2 gaming systems could be potentially submitted to labs  
3 if that 120-day period is modified? So have many are  
4 out there that were never certified the first time  
5 around.

6           And what would be the regulatory and other  
7 impacts of allowing a limited submission period for  
8 these systems that did not meet the original deadline?

9           In the preamble, the Commission says it is also  
10 considering amending it so that any modifications would  
11 have to be brought into compliance.

12           So if it's a grandfathered system, there may  
13 not be a deadline that it has to be removed from the  
14 floor. But if it was going to be modified, that  
15 modification would have to be completely compliant with  
16 Part 547.

17           So if this were done, what specific impacts  
18 would the amendment have on tribal gaming operations?

19           And then similarly, but a little bit different  
20 is, if it was not just modifications, but any time  
21 anything broke -- so if it was a repair, anything that  
22 was repaired also had to be brought into compliance --  
23 what would the effect of that amendment have on tribal  
24 gaming operations?

25           So the proposed rule also amends the test lab

1 certification requirements from the discussion draft,  
2 based on public comment. So now test labs have to note  
3 compliance with standards set forth by the TGRA.

4 It used to say -- the discussion draft said  
5 "any applicable federal laws and regulations." And a  
6 lot of the comments were, that's too much. It's too  
7 broad. The test lab may not be able to test for all  
8 those things.

9 So we've changed it. The TGRA can decide what  
10 the test lab needs to test for, as far as other laws  
11 go. And that's what the test labs will test to. So we  
12 took out the "applicable federal laws."

13 We're not going to talk about 547.6 because  
14 there's no substantive changes.

15 So we can go on to 547.7, which is, What are  
16 the minimal technical hardware standards applicable to  
17 Class II gaming systems?

18 It now reads that the player interface must be  
19 labeled with the serial number and date of manufacture.  
20 This is based on comments we got saying that the  
21 language in the discussion draft, which was that the  
22 player interface must display the serial number and  
23 date of manufacture, was confusing.

24 Because when we hear "display," we typically  
25 think of the display screen. And this can be anywhere

1 on the box. So it just now says "be labeled."

2 It also removed the reference to Underwriter's  
3 Laboratory, which is carried over from the discussion  
4 draft. And we also got several very supportive  
5 comments on that change.

6 The proposed rule, 547.8, What are the minimum  
7 technical software standards applicable to Class II  
8 gaming systems?

9 So another change that was made in the  
10 discussion draft and was carried over to the proposed  
11 rule -- and also very supportive comments, for the most  
12 part -- was removing any references to entertaining  
13 displays.

14 So now last game reading call doesn't have to  
15 show entertaining displays. And this was done, as  
16 explained in the preamble, because the game of Bingo is  
17 in the Bingo card, not the entertaining display.

18 It also still allows for changes in the rules,  
19 but those changes cannot be automatic, and they can't  
20 be undisclosed to the player.

21 So we'll skip 547.9 and 10 and 11 because we  
22 didn't make any substantive changes there.

23 And we'll go to 547.12, which is the minimum  
24 standards for downloading on a Class II gaming systems.

25 In response to some comments, we removed the

1 requirement that the TGRA authorize downloads. And  
2 it's not gone completely; it's just that that is a  
3 minimal internal control standard. So that's been  
4 moved over to 543.

5 We also require the Class II gaming system to  
6 be capable of providing download information, and the  
7 downloaded software has to be capable of being verified  
8 by the Class II gaming system.

9 547.14 is the minimum standards for the RNG,  
10 the random number generator. This requires the use of  
11 an unbiased algorithm.

12 In the current regulation in effect, the  
13 algorithm was set at a specific number. And that's  
14 been changed. We took out the number and now any bias  
15 must be reported to the TGRA.

16 I'm going to let Nimish talk about this one a  
17 little bit too. It's technical.

18 MR. PUROHIT: So we received some comments,  
19 actually, and I'll just give you a real quick history.

20 If you look at the bulletins that were issued  
21 when the first round of technical standards were  
22 passed, the specific number of the bias, of 1 in  
23 100 million, was deemed to be non-related to Bingo ball  
24 draws.

25 So because of that, the abuse of the -- the

1 bulletin itself addressed that another number might be  
2 specific enough for actually having the bias be  
3 allowable under these circumstances.

4 And under the advisement from the Tribal  
5 Advisory Committee during the discussions of the draft,  
6 there was actually a standard that was put out there  
7 that the Tribal Advisory Committee recommended.

8 And that is instead of removing the bias  
9 requirements altogether, how about putting in some  
10 language that says, if there is any kind of bias, then  
11 that should be recorded by the independent test lab,  
12 who is then going to let the TGRA, Tribal Gaming  
13 Regulatory Authority, know about that.

14 And then TGRA can make the decision on whether  
15 or not that bias is significant or insignificant to  
16 their requirements.

17 Furthermore, we also received some comments on  
18 the authenticity of the bias and saying that this is  
19 not a testable standard. And we're just asking in any  
20 future comments, please let us know as to how and why  
21 this is not specific a number or it's not a testable  
22 standard.

23 One thing I'll just remind everyone, that if  
24 you look at the context in which this bias section is  
25 in, it's to the scaling algorithm. It's not just to

1 the overall algorithm of the random number generator.  
2 It's just a very specific part of it.

3 So please take a look at that and let us know  
4 how it can be specified even further.

5 MR. HOENIG: Thank you, Nimish.

6 The other thing with the random number  
7 generator is that there are now -- and this was in the  
8 discussion draft as well -- certain mandatory testing.  
9 That is the Chi-square test, the Runs test, the Serial  
10 correlation test. Those are all now mandatory. This  
11 was put in there at the recommendation of the Tribal  
12 Advisory Committee.

13 And then there are some other tests that were  
14 specified and are still in there, but they can be  
15 performed at the discretion of the TGRA.

16 So there are no substantive changes to 547.15.

17 So we can go 547.16. What are the minimum  
18 standards for game artwork, glass, and rules?

19 And I had alluded to this earlier, where we  
20 were talking about removing the minimum odds  
21 requirements. And instead, there's now this additional  
22 disclaimer requirement.

23 And that is that if the odds of hitting any  
24 advertised top prize exceeds more than 1 million to 1,  
25 the player interface must display notification of such.

1           One of the changes that has been made since we  
2 introduced this in the discussion draft is to remove  
3 the word "continually." That created some confusion,  
4 and I think the idea is that it has to be -- the patron  
5 has to be notified someplace.

6           It can be on the rules screen. It can be  
7 anywhere really, but it just has to be there. There  
8 has to be notification at some point. So we removed  
9 the word "continually."

10           And finally we'll talk about 547.17. This is,  
11 How does a TGRA apply to implement an alternate  
12 standard to those required by this part?

13           This section used to be called "variances."  
14 And we have changed the term "variance" to "alternate  
15 standard," because, as Jennifer will talk about when we  
16 get to Part 543, variance was used a couple different  
17 ways in that section, and it was creating some  
18 confusion.

19           So instead of trying to figure out what  
20 variance meant here, as opposed to there, we just  
21 changed this use of it to be "alternate standard."

22           So now the TGRA must submit any alternate  
23 standard within 30 days of its approval. The Chair  
24 then has 60 days to approve the alternate standard, or  
25 object to it.



1           In talking to some of the field staff here that  
2 actually go out and check out these alternate  
3 standards, they said sometimes 60 days is more than  
4 enough to make a recommendation, and sometimes it's  
5 not. That it can be very complex, and they may need  
6 additional time.

7           So the Chair has the ability to extend the  
8 review period another 60 days, if it's necessary.

9           No alternate standard may be implemented unless  
10 approved by the TGRA or the NIGC Chair. So if the TGRA  
11 approves it can implemented, then it goes to the 60-day  
12 approval or review period.

13           The appeal of Chair objection to alternate  
14 standards. This section used to have its own appeal  
15 section; its own appeals process. And we've changed  
16 that to just include it with Subpart H, which is  
17 another part of the regulatory review process that the  
18 Commission has been working on. And that is to  
19 consolidate our appeals process and update it.

20           So now this will be part of the overall appeals  
21 process. So there's no more appeals process for the  
22 alternate standard variance section any longer.

23           And that is it for Part 547.

24           COMMISSIONER LITTLE: Thank you, Mike.

25           Now would be the time, like the Chair had said

1 earlier, if there's any tribal leaders that have any  
2 statements that they need to put into the record, that  
3 they'd like to read or just submit to the Commission,  
4 we can take those now or anytime.

5 We know many of you have schedules that you  
6 have to keep, so we don't want to force you to stay  
7 until maybe this afternoon or later this morning when  
8 we talk about Part 543. So you can discuss any of the  
9 two parts, if you'd like.

10 Does anyone have any comments they want to  
11 submit?

12 (No response.)

13 COMMISSIONER LITTLE: Okay. If there's not,  
14 then I'll open the floor up to any general comments.

15 I'll just remind everybody to please speak into  
16 the microphone. We have one that we'll bring to you.  
17 And, secondly, please state your name and your  
18 organization prior to speaking.

19 So I'll open the floor to any comments.

20 Tom? Sure. Go right ahead.

21 MR. WILSON: Tom Wilson with the Pascua Yaqui  
22 Tribe.

23 I apologize for being late. But I would like  
24 to say that, as you know, our tribe participated in the  
25 TAC. And we've had a significant amount of time now to

1 review Part 543 and look at what has been put out by  
2 the NIGC.

3           While it doesn't go as far as we would have  
4 liked it to have gone, we do feel that the NIGC was  
5 open to the concepts that we discussed and brought  
6 forward. And to the extent of practical, we believe  
7 that you have included in key significant things that  
8 we were looking for, at least in the proposed  
9 rulemaking as it exists now.

10           So, for example, this last piece we just  
11 discussed. We feel that that's a significant win for  
12 tribes, to be able to propose alternate procedures that  
13 can be put in place without having to jump through a  
14 myriad of hoops or rewrite regulations in order to get  
15 that done. So we thought that was a very important  
16 part of the aspect.

17           I know that there's been discussion about the  
18 grandfathering clause, which does not particularly  
19 pertain to us. As you know, we're not a major Class II  
20 facility. But we do think that the agency took that  
21 into due consideration as to what the impact of  
22 grandfathering or not grandfathering would be.

23           So in discussions with our Tribal Council,  
24 we just want to go on record that we are supportive of  
25 the changes that are being proposed. We feel that it's

1 workable and something that we can move forward with as  
2 an organization. But more importantly, the knowing  
3 that we're going to have something in place is critical  
4 to us.

5 And as you all know from when we originally  
6 started the TAC, we view that whatever happens with  
7 Class II as a significant platform for changes that  
8 could occur in Class III, which, of course, has a broad  
9 impact for our organization and probably most tribes.

10 So we believe that the Class III regulations,  
11 if they get taken up, whether it's this term or next  
12 term, in terms of looking at it and revising, that the  
13 steps that we made in Class II could help to set the  
14 foundation and framework for making similar types of  
15 changes and conceptual philosophical changes to how  
16 Class III regulations, perhaps, can be changed or  
17 modified.

18 COMMISSIONER LITTLE: Well, thank you, Tom.  
19 And once again, you were out of the room, thank you for  
20 your help on the Tribal Advisory Committee. It was  
21 very helpful.

22 You know, you raise a very good point. I can  
23 assure you the Commission is fully committed to the  
24 Class II issues, and we know the great benefits that it  
25 provides to many tribal communities, and that it's

1 important.

2 Throughout this process, we listened to the  
3 tribes, and it helped us fully understand what the  
4 implications of any changes can have on this industry  
5 when we make these decisions. So I appreciate your  
6 comments, and thank you again for your participation in  
7 the TAC.

8 CHAIRWOMAN STEVENS: I also want to say  
9 thank you to Tom and also to the Pascua Yaqui Tribe.  
10 It does mean a lot, especially since you were sitting  
11 on the TAC as a member.

12 And in echoing Commissioner Little's statement,  
13 we -- you know, it's been two years. I just sat here  
14 thinking, it has actually been two years. It seems to  
15 have gone by fairly quickly, but at the same time,  
16 we've gotten a lot accomplished. And we did not do  
17 that alone.

18 We understand that there are three regulators  
19 at the table, and that we can't operate in a vacuum,  
20 and that our relationship with the tribes and their  
21 regulatory bodies are especially important, especially  
22 on the Class II front.

23 We strive, as a Commission, to make  
24 deliberative, considerate, and fully-informed decisions  
25 before we would make major changes.

1           And, again, I want to thank everybody and all  
2 the tribes for coming along with us on our  
3 consultations, on all the discussion drafts.

4           Because as you've seen, we've received a number  
5 of comments that were helpful and informative, and that  
6 changed the proposed rule from the draft rule.

7           And that, to me, shows that the process that  
8 we're undertaking does work. It's doing what's  
9 intended, which is to have regulations in place that  
10 work for all of us. And we've come quite a ways.

11           I think this has been a good process, and I'm  
12 appreciative to Pascua Yaqui for recognizing that.  
13 So thank you for your comment.

14           COMMISSIONER LITTLE: Do we have any other  
15 comments on Part 547?

16           Yes, sir.

17           MR. LESLIE: Roger Leslie with the Sante Fe  
18 Pueblo Gaming Regulatory Commission.

19           Just for clarification -- I guess that's the  
20 third bullet point down. The chairman has 60 days to  
21 approve or object on the alternate standard that's  
22 proposed by the Tribe.

23           If there is no response or a decision made by  
24 the end of that time, is that construed as an automatic  
25 approval of that amended proposal?

1           COMMISSIONER LITTLE: Mike, do you want to  
2 address that?

3           MR. HOENIG: I hadn't considered that. But I  
4 guess the way that it's set up as the alternate  
5 standard can be implemented, once it's approved by the  
6 TGRA, if there's no objection. Presumably under this,  
7 it would be able to be used until there was an  
8 objection; although, the extent is to get an actual  
9 decision, I believe.

10           So that's an excellent comment that I think  
11 we'll all take into consideration. Thank you.

12           CHAIRWOMAN STEVENS: Do you have any preference  
13 or a suggestion with regard to that section, sir, or  
14 did you just want to clarify?

15           MR. LESLIE: Well, the reason I ask is because  
16 the ordinances are submitted the same, as if there's no  
17 objection, that it's automatically approved, and the  
18 tribe will go forward, accordingly. And I believe that  
19 this standard should be reflective of such.

20           COMMISSIONER LITTLE: Great comment.  
21 Thank you.

22           Other comments?

23           MS. HOMER: Good morning, Commissioners.

24           And thank you, Dan, for the acknowledgment.  
25 That's always appreciated.

1           And thank you, Tracie, for being here. And for  
2 the enormous amount of work that you all have done over  
3 the last couple of years to try to shape up these  
4 regulations.

5           I have just a couple of -- I have one question.  
6 One of the things that the preamble of your regulation  
7 does is ask for quite a lot of data. And I know that  
8 many of us are kind of scrambling around to try to put  
9 together all of that data and to get something back to  
10 the Commission.

11           I guess some of us are concerned that we may  
12 not be able to do it in the time frame that we have.  
13 just because it's such a big effort. There's no  
14 centralized source for all of this kind of data.

15           So I think that some of us are advocating for  
16 some extension of the comment period of -- you know,  
17 some modest extension. We're not talking about months  
18 on end, but some modest extension to be able to compile  
19 the data.

20           And we're wondering if the Commission is  
21 amenable to that if we're kind of in a pinch of getting  
22 the information.

23           I know the preamble does emphasize how much you  
24 need this data to make your decisions. And, I guess,  
25 from our side of the table, we want to make sure that



1 you have good quality data to make your decisions on,  
2 and we may have an issue there. So that's one issue.

3 The other one is that it occurs to us, as we  
4 have been parsing through -- and I've been working with  
5 the Tribal Gaming Working Group on this, just going  
6 through this rule step-by-step. That we now have kind  
7 of have a couple of grandfathers.

8 We've got different status of grandfather now.  
9 Because, you know, you've got everything that was  
10 before the 2008 effective date, and then you've got  
11 everything that has been certified subsequently to  
12 that, but before the effective date of the new  
13 standards. And that middle group, the since 2008  
14 group, is certified under the old standard.

15 And so we're thinking that the grandfather  
16 should somehow apply to everything, and that these  
17 regulations should be perspective in nature so that we  
18 don't have to recertify all of the systems that are  
19 certified under the current standard. So we raise that  
20 for your consideration.

21 And, finally, the issue is that there's various  
22 kind of little things that are a little bit confusing  
23 and any clarification on it -- I want to thank Nimish,  
24 in particular, in explaining that proprietary language.

25 Because when we parse these things, word by

1 word, sometimes these little issues will crop up that,  
2 well, what effect does this actually have?

3 And I guess our main concern, the one thing  
4 that we hope that the NIGC will seriously consider, is  
5 the elimination of the Sunset Provision.

6 We need to look back at the word "grandfather"  
7 a little bit more carefully, because we're kind of  
8 creating this category that's going to grow over time.  
9 Because as the standards get amended in the future, as  
10 technology evolves, we don't want to have a regulation  
11 that is creating different classifications of, well,  
12 this is the 2008 version. This is the standard that  
13 applies here. This was a 2000- -- you know.

14 Over time, that's going to make the regulation  
15 unwieldy. So we offer that up. And we will be having  
16 a suggestion in how to address that.

17 COMMISSIONER LITTLE: The point about extension  
18 of time, this is the first we've heard of this. So the  
19 Commission will consider that. We haven't made any  
20 decisions yet.

21 And then the second issue on the grandfather  
22 is -- actually kind of second and third and the Sunset  
23 Revision. I think I kind of need a little more  
24 clarification.

25 I think what you're saying is that -- and this

1 is my understanding. Once a grandfathered game comes  
2 fully compliance, it's no longer a grandfathered game;  
3 it's a fully compliant game. That's my understanding.

4 MS. HOMER: Yes.

5 COMMISSIONER LITTLE: And I'm not sure if you  
6 want to clarify that.

7 MS. HOMER: Yeah. I think that it's very  
8 important that that be stated specifically somewhere.  
9 Because right now, that has to be construed -- as you  
10 read the language, that's not specifically what the  
11 language says.

12 So that would be very useful, is that if  
13 anything becomes fully compliant -- if you read the  
14 regulation as it is right now, one interpretation is  
15 that once you're a grandfather, you're always a  
16 grandfather. You don't kind of graduate into a fully  
17 compliant system then. And I think that that's kind of  
18 a major issue that needs to be addressed.

19 Because if you can become fully compliant and,  
20 otherwise -- we kind of tagged grandfather into this  
21 special thing, like everything created prior to the  
22 effective date of the regulation in 2008. And I think  
23 we need to rethink that.

24 COMMISSIONER LITTLE: And I do appreciate you  
25 raising that, because it's a good point. And it would

1 be helpful to clarify, because when we do informal kind  
2 of info requests -- or maybe the manufacturers, when  
3 you ask them, many of them will say, "Well, we really  
4 don't have any grandfather games because all of ours  
5 have been brought to full compliance." So that would  
6 be helpful.

7 If you could submit that into a comment, that  
8 would be very helpful, and we'll review that. I'm not  
9 sure if Michael or the Chairwoman has anything  
10 additional to add to that, but I know that would be  
11 helpful.

12 And then the last point you raised about the  
13 sunset provision. I think that goes hand-in-hand with  
14 where we are and the information that we're asking for.  
15 So I don't really have anything I can definitively say.  
16 I don't know if Tracie or Mike does.

17 That's one of the things that we're definitely  
18 continually reviewing, and we're hopeful that through  
19 the information that we get during this comment period,  
20 we'll be able to make a better decision. So your  
21 comments will be helpful.

22 Teri?

23 MS. POUBST: Hi. Teri Poubst.

24 If I can just add to what Elizabeth was saying.  
25 Particularly, a part of the issue that we're having

1 with the -- when she was talking about the categories  
2 of grandfather games, you know, we've got kind of this  
3 body of pre-2008 games. Some of them are still  
4 considered grandfathered, and some have been brought  
5 into compliance with the existing regulations. But  
6 there are some that are still grandfathered.

7 And then once this regulation is finalized,  
8 you're going to kind of have a second category of  
9 grandfathered, those that are compliance with the rules  
10 as they are now, but aren't going to come into  
11 compliance with any additional changes.

12 So that's part of the issue that we're seeing.  
13 We've got kind of the pre-2008, and then we're going to  
14 have the 2008 to the 2012, and what happens thereafter.

15 We are also working with Elizabeth and the  
16 TGWG, trying to compile this information as to what  
17 games are out there. I know some of the manufacturers  
18 that we've talked to, they have brought a lot of their  
19 games, if not all of them, their systems and their  
20 boxes, into compliance with the standards as they  
21 exist.

22 The problem we're running into is there are a  
23 lot of tribes that, in the past, have purchased games.  
24 They may be playing them right now, or they may be in  
25 storage somewhere. And a lot of those have not been

1 brought into compliance.

2 So even the manufacturer saying, "Oh, we  
3 brought all of ours into compliance," well, there's  
4 Tribes A, B, and C out there that actually bought some  
5 of these machines a few years ago, well, those were  
6 never brought into compliance. So they consider those  
7 to be grandfathered games because they're still being  
8 played in the older format.

9 We're just having a hard time getting that  
10 information. We've been trying to talk with some of  
11 the manufacturers. Some of the tribes have been going  
12 back and looking. But just trying to collect that  
13 information from everybody has been a little bit  
14 difficult.

15 So just something else to kind of keep in mind,  
16 not just -- I guess maybe the differentiation between  
17 games that have been purchased by tribes and then those  
18 that are still being leased. Because there is going to  
19 be a difference between whether or not they've been  
20 brought into compliance or not.

21 COMMISSIONER LITTLE: Go ahead, John.

22 MR. MAGEE: Well, just to pick up on Teri and  
23 Elizabeth's comments here. The Pechanga Band, we still  
24 object, and my comments are similar to what we did in  
25 April when we met with you guys then.

1           We still object to the grandfathering clause,  
2           and we still subject to the sunset clause. I think we  
3           operate around 328 Class II games. They're not our  
4           primary device. We are a Class III facility, but we do  
5           offer the Class II as a way to offer other types of  
6           games to the patrons.

7           And so we're concerned that any regulations  
8           that are adopted, may affect the viability of a  
9           Class II product go forward, not only for us, but for  
10          other tribes across the nation.

11          You know, being a compact tribe, having a  
12          Class II game or system available to us, does help us  
13          out and gives us that ability to negotiate with the  
14          State, you know, when they become difficult to  
15          negotiate with. And anybody who's had a compact tribe  
16          here knows what I'm talking about.

17          And so what our concern, primarily, is -- and I  
18          stated this in San Diego, and I'll state it again for  
19          the record -- any standards that are put in place  
20          should only comply, applied going forward. And, you  
21          know, there's an analogy with the card industry. I  
22          know you guys have already heard them.

23          I just want to reiterate. We're really  
24          concerned about the standard being implemented and then  
25          having grandfathered in sunset clauses. And then we

1 have to go back and research the regs to see where this  
2 game is falling. But just to us, it gets complicated,  
3 and it's just messy.

4 So if we were going to adopt the standard, we  
5 would say, from this point forward, all games meet this  
6 standard. I hope I'm making that clear.

7 COMMISSIONER LITTLE: Very clear. Thank you,  
8 John. There's very helpful information there. We'll  
9 definitely take that into consideration.

10 And, Teri, the same for your comment there.  
11 It's very helpful.

12 I mean, we do understand the challenges that  
13 many tribes are faced with compacts coming up for  
14 renewal. I know we've got a number of them in the next  
15 few years, and a viable Class II industry is very  
16 important to you all.

17 So we definitely take that into account, and we  
18 will look at that.

19 One of the things that we are really asking  
20 for, especially on the grandfathering front is that,  
21 what are the implications?

22 The challenge that we face, as we know, a  
23 number of times with grandfathered games, is that the  
24 regulation allows them to be modified. But that  
25 doesn't mean the modification could bring the game into



1 full compliance.

2 What would be the outcome if requirement for  
3 grandfathered game was added that, while they can still  
4 be played, any modifications would have to be fully  
5 compliant? What would be the challenge? Would there  
6 be a challenge faced by the tribes if that was amended  
7 to say that?

8 That's what we're throwing out there to get  
9 some feedback. We'd like to hear about that.

10 So then the thing about the idea of now  
11 creating a new standard of grandfather games, I  
12 appreciate you raising that. I know the attorneys --  
13 and I know both of you are accomplished attorneys.  
14 We are always welcome to some suggestions, language, or  
15 comments. So, please, I urge you to give us some ideas  
16 because we're open to that.

17 Okay. Any other comments?

18 Okay. We're coming up on a break time here.  
19 Are there other comments on Part 547?

20 (No response.)

21 COMMISSIONER LITTLE: All right. Then we'll go  
22 to the break, and we'll come back at 10:45. Thank you.

23 (A recess was taken from 10:22 a.m. to  
24 10:49 a.m.)

25 COMMISSIONER LITTLE: Okay. We're getting to

1 get started again. Thank you everybody for coming  
2 back.

3 We're going to pick up to see if there are any  
4 additional comments for Part 547. If not, we'll  
5 probably move into Part 543.

6 So I'll open the floor back up to additional  
7 comments for Part 547.

8 (No response.)

9 COMMISSIONER LITTLE: Okay. Then I guess I  
10 will turn it over to Jen, who will go through the  
11 PowerPoint presentation of Part 543.

12 Like the Part 547, if you have specific  
13 questions or comments that you'd like to make during  
14 the PowerPoint presentation, just raise your hand, and  
15 we'll stop and you can address that issue right then  
16 and there.

17 And once again, because this is being  
18 transcribed, just state your name and your organization  
19 for the record when you do speak.

20 So, Jen?

21 MS. WARD: Good morning again.

22 We're going to go over Part 543-Minimum  
23 Internal Control Standards of Class II Gaming. This  
24 part addresses only Class II games and their associated  
25 functions.

1           The proposed rule that we're going over today  
2 is based on the discussion draft, and that was a  
3 document with ideas and language that was drawn up from  
4 several sources. And those included the current MICS,  
5 the TAC recommendation, TGWG guidance, and the 2010  
6 proposed MICS.

7           Generally, we made a few changes throughout the  
8 proposed rule. The first is that we reviewed the use  
9 of "agent, person," and "personnel" throughout the  
10 document, and we made changes where it's appropriate.  
11 So that where it says "agent, person" or "personnel,"  
12 it conveys what you've intended it to mean.

13           We also inserted "as needed" language in each  
14 of the supervision provisions, except in the IT  
15 section. And this was done to promote consistency in  
16 the proposed rule. We also added supervision  
17 provisions for Patron Deposit Accounts, Lines of  
18 Credit, and Surveillance.

19           In the definition section, the "drop proceeds"  
20 definition has been amended to include financial  
21 instrument storage component proceeds, as well as drop  
22 box proceeds.

23           The "drop" definition has been deleted from the  
24 discussion draft, because we feel it's unnecessary.  
25 The process of collecting boxes and financial

1 instruments storage component proceeds is described in  
2 this section.

3 Further, the definition of "gaming promotion"  
4 has been altered to include only those promotions that  
5 require game play to participate. And this is the same  
6 as the discussion draft.

7 The definition of "sufficient clarity"  
8 continues the 20 frames per second minimum, but as  
9 clearly identified to the requirements. So it'll say  
10 20 frames per second minimum and a resolution  
11 sufficient to clearly identify the activity being  
12 surveyed.

13 Further, the Commission invites comments of how  
14 this requirement might limit technology. We're  
15 wondering if 20 frames per second or the equivalent --  
16 if we have that language in there, "or the  
17 equivalent" -- may resolve any limitations in there,  
18 on technology.

19 There was one comment we received that said,  
20 if you limit it to frames per second, there might be  
21 some sort of surveillance technology out there that  
22 doesn't use frames per second.

23 So if we use "or the equivalent," does that  
24 resolve it?

25 Section 543.3, How tribes comply with this

1 part.

2           These are minimum standards and a TGRA may  
3 establish additional controls that do not conflict with  
4 this part. These regulations provide a framework that  
5 recognizes the significant role of TGRAs.

6           Throughout this document, TGRA has established  
7 thresholds for investigating variances and to implement  
8 procedures for various standards. They have 12 months  
9 to comply by establishing and implementing procedures.

10           And also note that there is a difference  
11 between existing and new facility compliance dates.  
12 New facilities need to comply immediately, and existing  
13 facilities have until the beginning of the next fiscal  
14 year.

15           Under 543.4, the small and charitable  
16 exceptions, the Commission invites comment on whether  
17 the charitable exception is still necessary.

18           As we looked over it, it appeared that the  
19 charitable exception may be swallowed up by the small  
20 gaming exception. I believe they both have the  
21 \$3 million threshold.

22           And if the gaming operation makes less than  
23 \$3 million, does it matter if it's charitable or not?  
24 Does it matter if it meets all of the exceptions of the  
25 charitable, because it already qualifies under small

1 gaming?

2 So we're asking you to take a look at that and  
3 let us know if you think we can streamline it by  
4 getting rid of the charitable exception because it may  
5 already be included under small.

6 543.5, How Tribes Apply to Use an Alternate  
7 Standard.

8 We might have covered this in the 547  
9 discussion. We've changed the term from "variance" to  
10 an "alternate standard."

11 Because, as you know, in the MICS, when we talk  
12 about variances, we talk about an outcome that is  
13 different from what the expected outcome was, and that  
14 gets investigated.

15 So here, just to clarify, we've changed the  
16 term to "alternate standard."

17 The TGRA may approve an alternate minimum  
18 standard, but they still must obtain approval from the  
19 NIGC Chair. And the NIGC Chair has a review and a  
20 decision within 60 days, and, again, just as in 547,  
21 the option to extend an additional 60 days, when  
22 necessary.

23 543.8, the MICS for Bingo.

24 This has been changed substantially from the  
25 discussion draft in that, we listened to the comments

1 that we received, and they all said, "Hey, Bingo is  
2 Bingo. Make it all one section. There's no need to  
3 differentiate between Class II gaming systems and  
4 manual Bingo."

5 And the commission has done that here.  
6 It's been combined into one section. And 543.7 is now  
7 reserved.

8 This is less procedural than the existing MICS,  
9 but it does require TGRA and/or the operation to  
10 establish controls that meet detailed criteria. And,  
11 for example, you can take a look at 543.8(b)(1), the  
12 Bingo card inventory, to see how this plays in.

13 It also requires verification of prizes over  
14 \$1,200, and the player interface may serve as one  
15 verifying signature.

16 This was unintentionally done in the discussion  
17 draft that made it look like the player interface could  
18 not verify or validate the prizes. And that was an  
19 oversight. We've corrected it here. So where it's a  
20 manual payout, the player interface may serve as one  
21 verifying and validating signature.

22 And if it's an automatic payout, it may serve  
23 as the sole validating and verifying signature.

24 Under 543.9, the MICS for Pull Tabs.

25 Pull tabs of \$600 or more require prize

1 verification. And the kiosk definition here has been  
2 amended to clarify that it may also be capable of  
3 redeeming and reconciling pull tabs.

4 There was a comment on the pull tab section  
5 that required the kiosk to -- well, requiring all pull  
6 tabs that have been redeemed to be defaced may limit  
7 technology because some kiosks may not be capable of  
8 defacing the pull tabs.

9 So we've amended this in the proposed rule.  
10 And when pull tabs are redeemed and reconciled by a  
11 machine, there's no defacing requirement. Instead,  
12 pull tabs must be secured and destroyed, in accordance  
13 with TGRA policies and procedures.

14 543.10, MICS for Card Games.

15 TGRA's review and approved cancellation and  
16 removal procedures. This continues the standard that  
17 no administrative or overhead fees may be taken from  
18 player pool funds.

19 We did receive one comment that the supervision  
20 section in this section may not provide for adequate  
21 supervision of the card room. And we request  
22 additional comments on that.

23 In that section, I believe it says that where a  
24 supervisor is functioning as a dealer, then a  
25 supervisor from another department may resolve any



1 disputes.

2 And the comment was, if a supervisor is  
3 functioning as a dealer, there's not adequate  
4 supervision. So we would appreciate your thoughts on  
5 that.

6 Section 543.12, MICS for Gaming Promotions and  
7 Player Tracking.

8 The gaming promotion standards are limited to  
9 those promotions that require game play to participate.  
10 And as is explained in the preamble, this section does  
11 not apply to promotions, such as the door prize  
12 tumblers, where participants may enter simply by  
13 dropping a free card into the drum.

14 The gaming promotion section includes only  
15 those promotions that require game play in order to be  
16 eligible for the prize.

17 Player tracking is also included in 543.12  
18 because it tracks game play and gives awards based on  
19 that game play.

20 Section 543.13, the MICS for Complimentary  
21 Services and Items.

22 It requires that TGRA and the Operation to  
23 establish specific controls and procedures. The TGRA  
24 also establishes the threshold for recording comps.

25 Section 543.14, the MICS for Patron Deposit

1 Accounts and Cashless Systems.

2 We've eliminated any reference to  
3 "unrestricted" player accounts. Because of the Bank  
4 Secrecy Act, it doesn't allow for those sort of  
5 accounts that can be accessed by anyone.

6 Section 543.15, the MICS for Lines of Credit.

7 This establishes the controls for the lines of  
8 credit. And we also received a comment that this  
9 provision may be unnecessary, and we request additional  
10 comment explaining why this may be unnecessary.

11 We've heard at various consultations that there  
12 are several tribes that do use the lines of credit, and  
13 there are others that are considering using them in the  
14 future. So we would appreciate your additional  
15 comments on this.

16 Section 543.17, the MICS for Drop and Count.

17 This has been simplified, and it allows for  
18 more TGRA and Operation discretion.

19 Section 543.18, MICS for Cage, Vault, Cash,  
20 Cash Equivalents, and Kiosks.

21 We've added the kiosk section in. Again, this  
22 is the same as the discussion draft, with the exception  
23 that we've adjusted the definition of kiosk a bit, and  
24 you'll see that in 543.2, the definition section.

25 Any cage increase or decrease of \$100 or more

1 must be verified, documented, and recorded. And  
2 promotional payments of \$100 or more must be  
3 documented.

4 Section 543.20, the MICS for Information  
5 Technology and IT Data.

6 Most of these topics were adopted from the TAC.  
7 You'll see the list of them there, and I'll just  
8 highlight a few. They include physical security,  
9 logical security, data backups, change management,  
10 remote access.

11 Here we also added a definition of "system" in  
12 the IT section, to distinguish it from Class II gaming  
13 systems, for the IT section only.

14 And this was based on public comment that said,  
15 it's difficult to distinguish whether you're talking  
16 about something new entirely or whether you're talking  
17 about Class II gaming systems.

18 So we went ahead and included a separate  
19 definition here in the IT section.

20 543.21, the MICS for Surveillance.

21 It requires cameras with sufficient clarity.  
22 Again, this was the 20 frames per second minimum and  
23 then a resolution sufficient to clearly identify.

24 It requires those for the count room, card  
25 tables, and cage and vault. And for Class II gaming

1 systems, surveillance must include the Jackpot meter.

2 Based on public comment, we did remove the  
3 requirement for surveillance of the Bingo server. And  
4 after looking through the IT section, we determined  
5 that the physical and logical controls over the Bingo  
6 server were appropriate to control against any risk.

7 The Commission invites comments on whether the  
8 one-year retention period for surveillance footage is  
9 appropriate.

10 Now, as a bit of clarification here, we  
11 received a comment in Green Bay, I think it was. And  
12 we wanted to clarify that, generally, surveillance  
13 footage need only be retained for seven days.

14 But in this case, we were talking about footage  
15 of suspicious activity, suspected crimes, and detention  
16 by security personnel. The proposed rule requires that  
17 to be retained for a period of one year.

18 There was a comment that one year may be a bit  
19 too long. So we're requesting comment on whether it is  
20 too long. Is it too short? Should it be left up to  
21 the TGRA? Any suggestions, we're open to hearing from  
22 you.

23 And, additionally, just as it was in the  
24 discussion draft, this section requires TGRA approved  
25 procedures for reporting suspected crimes and

1 suspicious activity.

2 Also there's clarification from Green Bay.  
3 There was a comment asking whether we define suspicious  
4 activity the same way it's defined in the Bank Secrecy  
5 Act. And the answer is no. Suspicious activity is  
6 whatever the tribe defines it as.

7 If you think you'd like to see a specific  
8 definition stating that, for clarification, let us  
9 know. If you have any other comments on how to define  
10 suspicious activity, let us know.

11 543.23, the MICS for Audit and Accounting.

12 The annual requirements of this section are  
13 adopted from the TAC recommendation. And I believe  
14 that it took that from the TWGW guidance.

15 543.24, the MICS for Revenue Audit separated  
16 this from audit and accounting, and it specifies the  
17 frequency of each testing procedure.

18 And the game sections, such as Bingo, pull  
19 tabs, and card games, those are adopted from TGWG  
20 guidance as well.

21 And you'll note in here, slightly different  
22 from the discussion draft, we've combined the Bingo  
23 requirements into one instead of separating them out,  
24 again, into the Class II gaming systems and  
25 Mingo/Bingo, just to be consistent.

1           And with that, I'll open up the floor for  
2 questions and comments.

3           COMMISSIONER LITTLE: Thank you, Jen.

4           That was a lot of information that Jen just  
5 covered. So I'm not sure if anyone has any comments  
6 yet, but now would be the time if you want to make a  
7 comment for the record.

8           Yes, sir.

9           MR. LESLIE: Roger Leslie, San Felipe Pueblo  
10 Gaming Regulatory Commission.

11           My question is for the generalized question of  
12 the timeline and when the anticipated approval and  
13 finalization of these proposals will be done.

14           As I know, some properties are interested in,  
15 whether they start Class II gaming or already have  
16 Class II Gaming, when is it going to be applied as an  
17 official rule.

18           As well as, will these MICS be completed prior  
19 to the Commission's terms, as terms are coming close to  
20 the end?

21           COMMISSIONER LITTLE: Like Jen had mentioned,  
22 the existing establishment would have 12 months to  
23 comply.

24           Correct? Is it 12 months?

25           MS. WARD: Yes.

1           COMMISSIONER LITTLE: And then, however, any  
2 new facilities that have not opened yet would be  
3 required to adopt the new standards, from the time of  
4 opening.

5           As far as how far we get along, whether or not  
6 these regulations will go to final rule prior to the  
7 end of our terms, as you probably know, the Vice-Chair,  
8 her term is up at the end of this year. Mine is up in  
9 April. And the Chairwoman is up in July of next year.

10           So we're not really looking to -- I mean, we're  
11 moving this along as we progress, taking into account  
12 parameters, the challenges, and the comments that we  
13 receive.

14           As we went through the PowerPoint, the Notice  
15 of Proposed Rule, a lot of this is from the discussion  
16 draft that came out in the middle of March. So it's  
17 been out for a long time.

18           The majority of the changes to the Notice of  
19 Proposed Rule were from the discussions that were made  
20 and as a result of comments from tribes. So it's been  
21 out there for a long time.

22           I know there was a comment earlier about  
23 possibly extending the deadline for comments. We  
24 haven't really looked at any of those yet, nor have we  
25 kind of set a definitive timeline of when we have to

1 get things done. Obviously, we will want to move these  
2 along as much as we can.

3 As far as the 543, it's actually scheduled to  
4 go into effect this October, that part that's on hold.  
5 But it is going to go into effect in October. So to  
6 help the industry, we want to make sure that we're  
7 moving these along as quick as we can so that we don't  
8 have any conflicts there.

9 So all I can say is that, if you could, just  
10 send in your comments and raise any areas of concern  
11 that you have.

12 Like I said, there are two additional  
13 consultations sessions scheduled. Or you can obviously  
14 send in written comments. They're very helpful.

15 CHAIRWOMAN STEVENS: Well, I want to thank the  
16 gentleman for asking that question. Because one of the  
17 concerns that we walked into our positions with, was a  
18 concern about these particular regulations sitting in  
19 advance for years and having them be unresolved for  
20 years.

21 And from an Operation standpoint -- and I've  
22 worked in Operation -- it's frustrating.

23 And from the Commission's standpoint, it's  
24 frustrating to not have defined standards. It's all  
25 been up in the air for at least six years, if not



1 longer, while changes have been proposed, made,  
2 finalized, held.

3 We understand that that creates a problem for  
4 tribes, the commissioners, and the operators. And so  
5 we do want some certainty finalized as soon as  
6 possible. Mostly because we realize how frustrating  
7 and encumbering that can be to tribes.

8 So I appreciate you raising that. And as Dan  
9 said, we're moving along as quickly -- but also  
10 depending on the kind of comments we receive,  
11 respecting those and considering those may affect any  
12 timeline or how long this process takes.

13 So with you, we want some certainty as soon as  
14 possible, but it is contingent upon what kind of  
15 feedback we get.

16 COMMISSIONER LITTLE: Is there another comment?

17 Yes, sir.

18 MR. WILSON: Tom Wilson, Pascua Yaqui Tribe.

19 Just a comment on the frames per second issue.

20 We struggle with this all the time when it comes to  
21 technology. It certainly seems like it would make more  
22 sense to define a level of clarity that you're looking  
23 for, as opposed to saying that if you're meeting 20  
24 frames per second.

25 We deal with this issue right now in our

1 compact when we're trying to look at camera coverage  
2 and the sufficiency of it. And one of the debates that  
3 we have frequently is, how sufficient is the clarity?

4 And what do we mean by that. I think it's more  
5 helpful, rather than saying a 20 frames per second, to  
6 say clarity means to be not just sufficient, but  
7 sufficient to do what? To be able to read bills  
8 sitting on the table? To be able to read paint lines  
9 on a machine?

10 What is the level of clarity that you're  
11 looking for? And then allow the tribe to adopt  
12 whatever technology exists to achieve that level of  
13 clarity.

14 So I worry when I see words like "sufficient  
15 clarity." Because now we get into discussions of, this  
16 is sufficient for my purposes, but it might not be  
17 sufficient for your purposes.

18 So what exactly is it that we're trying to see  
19 and can we define that to something specific.

20 COMMISSIONER LITTLE: Thanks, Tom. Thanks for  
21 that comment.

22 I know this is a subject that -- boy, at TAC,  
23 we spent a couple hours on this, it seems like,  
24 discussing this whole issue. I know a lot of concerns  
25 that were raised were exactly what you said, that the

1 technology of the camera should fit the need or, you  
2 know, what it's being utilized for.

3 And we did grapple with that extensively in our  
4 internal discussions. And I think that's one of the  
5 reasons why -- you know, a definition, we need to  
6 clearly identify whether it's the chip or the  
7 domination or whatnot.

8 But we are still looking for more information.  
9 So if you would like to comment, this is an area where  
10 it would be greatly appreciated.

11 CHAIRWOMAN STEVENS: I appreciate you bringing  
12 that up because there has been a lot of discussion  
13 around this.

14 And what I find interesting is that -- you  
15 know, I agree with you. What is one person's or  
16 division's -- either an organization or the  
17 Commission's definition of sufficient clarity? Because  
18 there can be, surprisingly, disagreement between the  
19 Operations and the Commission --

20 (Laughter)

21 CHAIRWOMAN STEVENS: -- on what exactly is  
22 sufficient clarity.

23 So if you do get mixed requests from us, you  
24 should clearly define it so that we have something to  
25 hold the Operations to. Or, you know, the Operation

1 says, "Well, what does that mean" because it's unclear.

2 So we do get mixed requests about, well, how do  
3 we do this? We even heard -- somebody said 20 frames  
4 per second was not enough. It's like, that's not  
5 enough. And others have said that's too restrictive.

6 So we welcome some thoughts on how to approach  
7 this. We do try to find some balance between certainty  
8 of what we're trying to identify -- or whether it's the  
9 regulators or operators -- but some flexibility for  
10 tribal operations.

11 And just tribes, generally, to what level can  
12 they -- that's not cost prohibitive for tribes that may  
13 not have the funds necessarily to have something really  
14 sophisticated.

15 So we certainly welcome this. We've talked  
16 about it for hours. TAC talked about it for hours.  
17 It's been a subject of discussion for quite a while, so  
18 suggestions are certainly welcome.

19 COMMISSIONER LITTLE: Another comment?

20 (No response.)

21 COMMISSIONER LITTLE: Now, I know the  
22 Chairwoman, she can start going back and start pulling  
23 out questions here, so...

24 Yes, sir. Please.

25 MR. BENATZ: George Benatz, Gila River Gaming

1 Enterprise.

2 I realize these are minimums. Having been a  
3 regulator, I understand their importance. But I'm  
4 struck by the fact, with a lot of minimum internal  
5 controls, that we don't define things specifically.

6 For example, the game of Bingo. I look at the  
7 minimum internal controls; I can't figure out how Bingo  
8 is played. And maybe that's so elementary it's not  
9 necessary. But if you're trying to train to the  
10 standard, I really would like to see a definition of  
11 Bingo, a definition of poker games, that type of thing.

12 COMMISSIONER LITTLE: That's a very good  
13 comment. Thank you.

14 It's always good to come to these events and  
15 you hear different aspects and different views, and  
16 that's very helpful. I definitely would invite you, if  
17 you want to submit that into a written comment, with  
18 any suggestions you might have, that would be very  
19 helpful. So we appreciate that comment. Thank you.

20 Another comment? Nothing on gaming promotions?  
21 Player tracking?

22 You know, this is an area where the TAC had  
23 grappled with, and it was an area of aversive  
24 authority. We went through these sections to make sure  
25 that we made it very clear that we were only looking --

1 especially with promotions, it only applies to areas  
2 where gaming is required.

3 That if there was a general raffle that didn't  
4 include any kind of play, where you put your name in a  
5 tumbler, that that was not included. But if it was a  
6 promotion that you had to put money into a gaming  
7 device, then it was included.

8 So I'm not sure if anybody has any comment on  
9 that, or comps, or lines of credit because these are  
10 some areas that have been raised previously.

11 MS. POUST: Dan, Teri Poust again.

12 Just quickly. And thank you, since he was  
13 mentioning Bingo. Thank you for putting the Bingo  
14 sections back together. We are very appreciative that  
15 the Commission was receptive to those comments. And I  
16 think going forward, that's going to be very  
17 beneficial. So thank you for doing that.

18 CHAIRWOMAN STEVENS: Thanks, Teri.

19 I know we have a number of regulators in the  
20 room, and Dan had just mentioned promotions, player  
21 tracking.

22 How -- I don't know how else to put this.  
23 How does it help you to have the regulations over  
24 promotions and player tracking, from your standpoint as  
25 a regulator? Does anybody have any issues around those

1 or that help you to do your job?

2 (No response.)

3 CHAIRWOMAN STEVENS: If they weren't there, how  
4 would that affect your job?

5 There we go.

6 MR. WILSON: Tom Wilson.

7 If they weren't there, it would not change what  
8 we do or how the Operation functions. In Arizona, of  
9 course, under our compact, we have a section that deals  
10 with promotions and lotteries.

11 The section on promotions is one paragraph.  
12 The sections on lottery, of course, is much more  
13 extensive.

14 With player tracking, we view player tracking  
15 really as an operational system that is not a gaming  
16 system, per se. And it's a management tool that's used  
17 to monitor and track player activity.

18 And I'm not saying, in absence of regulation,  
19 that we wouldn't have some level of control or perhaps  
20 tribal-based regulation over some of those things.  
21 But it's not an area that we consider to be very high  
22 risk, especially on the promotion side of it, in terms  
23 of how those transactions come about; what's done with  
24 them; the operations required, just in order to conduct  
25 a promotion, financially, to track those transactions.

1           So there's something that -- there are controls  
2 in place, from a financial and accounting standpoint,  
3 anyhow, similar with the player tracking system.

4           We've gone on record before that we don't feel  
5 that NIGC -- that this is an area that typically it  
6 speaks to in player tracking and promotions.

7           And I will say the same thing that we've said  
8 in the past, that while we're not saying that there  
9 shouldn't be some form of control over those  
10 activities, that should be something that derives at  
11 the tribal level and not from the federal regulation.

12           COMMISSIONER LITTLE: Thank you, Tom.

13           I think we have another comment back here.

14           MS. HOMER: Thank you, Dan. Elizabeth Homer  
15 again.

16           You know, I think I'm going to depart from my  
17 usual harangue of you guys and tell you what I like  
18 about how you approach the MICS.

19           And in response to Tracie's question -- and I  
20 also commend you for asking the question. I really  
21 love when we're in a dialog, as opposed to kind of  
22 talking at each other. I think that that's just so  
23 much more helpful for all of us to kind of understand  
24 what's going on.

25           And to follow up on what Tom was saying is



1 that, what I like about this version of the MICS, or  
2 this approach that you're taking, is it's making it  
3 more clear that these standards are to be set by tribal  
4 gaming regulators.

5 If you're regulating in these areas and you're  
6 ensuring that there's policies and procedures that  
7 establishes adequate controls of these areas, then  
8 that's what you should be accomplishing here.

9 And I think it's good -- you know, as tribal  
10 regulators, when we get challenged -- and I'll speak on  
11 behalf of my tribal regulator clients. When we get  
12 challenged, to say, "Well, it's here in the regulation  
13 that these areas are within the purview of our Tribal  
14 Gaming Regulatory Agency." So I think it's helpful in  
15 that regard.

16 Where it becomes less helpful is, one, where  
17 there is an issue of authority, where there is an issue  
18 of NIGC authority over a particular subject matter, and  
19 where it gets so specific that you're really tying the  
20 tribe to a one-size-fits-all procedure.

21 And in a sense, that was why the TGWG was  
22 recommending that you establish these broad standards.  
23 So these are the areas that have to be controlled.

24 And then how you control those, you leave more  
25 discretion in the hands of the Tribal Gaming Regulators

1 so that we can fashion controls that are appropriate to  
2 this particular agency.

3 Like, for example, I represent the Chickasaw  
4 Nation of Oklahoma. We have 18, soon to be 19, Tribal  
5 Gaming Operations. They're not all equal. We have  
6 clausal-sized outfits, and we have a big giant -- I  
7 think we're the second-largest casino in the world.  
8 And you can't have exactly the same standards that are  
9 going to fit both of those.

10 So the flexibility to control these areas in a  
11 way that is unique to those particular conditions is  
12 really important, from that perspective. And that kind  
13 of thing really does need to be done at the primary  
14 gaming regulatory level.

15 So that was kind of the thinking behind what  
16 the TGWG had proposed. But at the same time, have the  
17 agency to establish guidance documents that would help  
18 folks understand, if you follow this procedure, you're  
19 going to be meeting the standards that we're  
20 establishing at the regulatory level.

21 And I noticed that that was not the approach  
22 that the agency has taken. That it really is to kind  
23 of -- I know that a lot of the standards, even the  
24 proposed MICS, come out of the TGWG guidance documents  
25 that were submitted to the NIGC. But you didn't take

1 the broad standards and then items, documents approach.

2 I don't know. I would just be interested in  
3 your thought process there. I mean, what kind of  
4 tipped the balance in the approach that you've taken in  
5 the proposed rule?

6 COMMISSIONER LITTLE: Thanks, Liz. Thanks for  
7 your comments.

8 Yeah, it was a challenge. I mean, the  
9 Commission is very, very grateful for all the hard work  
10 that the Tribal Gaming Working Group did. We know it's  
11 been around a long time. We participated with this  
12 group when we worked for tribes, and it's very, very  
13 helpful.

14 But I think we disagree with some of the  
15 approaches there, that you can't place the majority of  
16 regulation and the guidance where there's no authority  
17 there to enforce that. And we do see some areas where  
18 there are some problems. Not necessarily many of the  
19 folks in the room here, but some of the other tribes  
20 that have some challenges there, that they need a clear  
21 standard.

22 Oftentimes, we see tribal TICS that they have  
23 our regulation just adopted hoopla, right in there. So  
24 it needs to be clear.

25 And, you know, I tell you, we spent a lot of

1 time going through the MICS, looking for areas that we  
2 can streamline.

3 I know one of the areas that we spent a lot of  
4 time was with the drop and count. And it's very  
5 intensive. It's a long section, but it's such a  
6 critically important section because it's where the  
7 cash is. That's where it's handled.

8 And how do you streamline that without removing  
9 some critical standards that some tribes that are in  
10 different levels in their sophistication -- you know,  
11 how it helps all. And that is a challenge.

12 And we know it's been raised before, you can't  
13 have one-size-fits-all. But we do have to create a  
14 regulation that does fit all.

15 So we did face some challenges. We feel that  
16 this regulation identifies the areas where it can be  
17 less strict, but still maintain a strong standard. We  
18 share with all of you that we want this Class II to  
19 maintain strong regulations and keep the high standard  
20 that is out there. But we want to make sure that any  
21 critical efficiency that we can identify can be  
22 addressed to a standard.

23 So that's our logic and reasoning. I don't  
24 know if the Chair has anything to add to that, but I do  
25 understand your comments.

1           CHAIRWOMAN STEVENS: Thanks for asking that  
2 question. Also thanks for recognizing that we're  
3 trying to have a dialogue and get some feedback.

4           I also understand that many of the folks here  
5 serve as sort of scouts, gather the information, go  
6 back to your regulatory bodies and to your council to  
7 develop your position. And we still appreciate that  
8 you all are attending and are here. And, hopefully,  
9 this is very informative to that process you're going  
10 through.

11           But agreeing with Dan that, you know, this was  
12 a challenge for us to think about, especially having  
13 come from a tribe and a casino myself. And from a  
14 policy standpoint with my tribal government, it was a  
15 struggle for all of us.

16           In addition to what Dan has said, also looking  
17 sort of putting this into a bigger context of over  
18 time. As I said earlier, these have been sitting  
19 unattended, or at least not -- in a place where tribes  
20 couldn't utilize them.

21           The history has been that there was one minimal  
22 internal control standard. It was when we went to  
23 separate those two. We've got standing Class II  
24 minimal internal control standards that are in the  
25 Register, that have been put on hold.

1           Because as we came in, we heard, "Hey, these  
2 are even out of date now, in 2010." So we needed to  
3 address them.

4           Also the feedback we received about those that  
5 are in the Register now, that they were openly  
6 restricted. They were too prescriptive, to the point  
7 where we were talking about paper and pen and 8 and a  
8 half by 11. You know, it was just too detailed.

9           And in addition to what Dan has said, putting  
10 it against that backdrop, we think that this is  
11 significant progress over what has been wallowing  
12 around over some years' time and that these have been  
13 significantly contributed to by tribes.

14           And keeping in mind, like Dan has said, we have  
15 to find what works for every tribe and especially  
16 understanding that not all tribes are as advanced or  
17 have the funds available to do what other tribes who  
18 have that are going to do.

19           And that we don't know the exact number of how  
20 that ratio would work out. But we do hear quite a bit  
21 actually from the regulators who say they want  
22 something definitive, but also trying to balance that  
23 against some tribe's abilities to handle it themselves.

24           I know that doesn't fully answer your question,  
25 but those are things that we had to weigh. And putting

1 it into the context of six or seven years of everybody  
2 waiting around, making it difficult for Rest over there  
3 to do any audits when we have tribes asking for them.

4 So I hope that gives you enough information on  
5 what -- you know, we have been very deliberate about  
6 this, not coming in with a preconceived idea or answer  
7 about how we were going to do this, but have gone along  
8 as we proceed and put a comment -- and considered those  
9 as we've made changes.

10 MS. HOMER: Just a quick follow up on that.  
11 You know, I truly appreciate how difficult it is to  
12 deal with the MICS, having myself and Teri worked on  
13 the first revision of the MICS. And believe me, there  
14 was a lot more hullabaloo over those than we've seen on  
15 these.

16 You know, Dan, you had mentioned  
17 enforceability. And, you know, the MICS is something  
18 that's really never been subject to an enforcement  
19 action, in the history of the NIGC.

20 My question is, do you see the enforceability  
21 of the MICS enforcing that there be MICS and that those  
22 MICSs be compliant? Or do you see enforceability as to  
23 the specific provisions?

24 And can you anticipate an enforcement action  
25 based on an audit? How does that issue play out in

1 your minds?

2 COMMISSIONER LITTLE: You're absolutely  
3 correct. There has never been an enforcement action  
4 taken for a MICS violation, from any Commission, not  
5 just this one here.

6 But, you know, tribes do a very good job at  
7 following the standards and complying, and it may be  
8 one of the reasons why we haven't had any enforcement  
9 actions.

10 I mean, I kind of look to the staff, where they  
11 spend a lot of time doing training and technical  
12 assistance, so that in areas where they do have  
13 identified problems, it gives us an ability to rectify  
14 them and work with the tribes to fix those areas.  
15 So that may be one of the reasons why there hasn't been  
16 any enforcement action for any MICS violations.

17 But the other, I think, is just to give credit  
18 to the TGRAs and the Operations, that they are  
19 following the standards. And, you know, most often,  
20 the standards that they adopt are much stricter than  
21 what we require.

22 So that's the reasoning, I think. And I think  
23 that's why we don't see more MICS violations.

24 But, secondly, is the Part 542. Probably the  
25 last time it was changed was when you did it. So I



1 think any kind of major overhauling -- I think it's  
2 been updated over the years.

3 But touching back on what Tracie had said  
4 earlier is that these standards are quickly becoming  
5 outdated. And the one that's on hold, the 543 that's  
6 on hold, is quickly becoming outdated.

7 And we know the 542, that a lot of them tried  
8 to utilize as a framework, is outdated. And new  
9 technology has changed so quickly that we do need to  
10 get these standards in place so that there's some  
11 guidance to go by there.

12 MS. HOMER: Just a quick follow-up.

13 Well, that's one of the reasons why I asked you  
14 the question. Because coming from a tribal  
15 perspective, the more detailed the standard is, the  
16 higher the potential that something is not going to --  
17 I mean, we don't live in a perfect world.

18 And there needs to be a distinction between  
19 regulatory noncompliance, statutory violation, these  
20 kinds of things, between a significant --

21 If we're talking about enforcement, and we have  
22 highly detailed standards, and somebody does an audit  
23 and says, "Oh, my gosh. On this day, you're supposed  
24 to have three signatures, and you only have two  
25 signatures. So now, boom, we're going to issue the

1 enforcement action," You know, the more detailed they  
2 are, the more of the opportunity that something might  
3 go wrong and will have potential for a federal  
4 enforcement action.

5 Now, let me couch that by saying that, I don't  
6 have any doubt in my mind as to the good faith of this  
7 Gaming Commission, the NIGC, as it is today. Okay?

8 I have utter faith in your good faith and your  
9 goodwill, but you're not always going to be here.  
10 There's going to be future representatives appointed to  
11 the NIGC. And I guess when we go really, really  
12 detailed and we're basing that on enforcement  
13 authority, I get scared that it could be abused. It  
14 could be abused by a federal agency.

15 And I guess, in a sense, that's one of the  
16 reasons why we would prefer the more generic standard  
17 with, these are the issues that have to be covered.  
18 These are the minimum things to be covered.

19 And then at the perspective procedural level,  
20 this is how you do that, rather than at a federal  
21 regulatory level. You know, just to prevent any kind  
22 of future abuse of authority.

23 CHAIRWOMAN STEVENS: Okay. And I appreciate  
24 that view and certainly understand the sort of looking  
25 forward on how these might be interpreted by future

1 Commissions.

2           And, again, keeping them in context of the sort  
3 of history of these regulations, I think they're a vast  
4 improvement on the prescriptive nature that they have  
5 been in the past, to what we put out there today, in  
6 trying to find that balance so that there are some  
7 guideposts for the tribes that aren't as advanced as  
8 tribes that are and having enough deference to those  
9 tribes so that they can have greater standards in  
10 place, if they so wish. And that we're all having some  
11 baseline.

12           We'll certainly take these comments into  
13 consideration in moving forward on how we might  
14 approach that, but trying to keep everybody in line  
15 that we have to be mindful of.

16           COMMISSIONER LITTLE: And just adding on to  
17 what Tracie had said was, you know, -- and I give a lot  
18 of credit to our staff. I mean, we sat in our  
19 conference room and just going through the specific  
20 areas and lines. Okay. How can we streamline this  
21 sentence or this section?

22           And there were a lot of areas. I give them a  
23 lot of credit for thinking out-of-the-box in the way  
24 that we had usually done things in the past. And they  
25 did a real good job.

1           But if there are other areas, please let us  
2 know. If there are areas where you think we could,  
3 while maintaining the standard, just make it less  
4 specific.

5           One of the areas that the Chairwoman identified  
6 was, there was an area where it said that a report had  
7 to be submitted on an 8-and-a-half by 11 sheet of  
8 paper. You know, that was not an issue. We just need  
9 the information. We really don't care what it's  
10 submitted on.

11           So different areas like that, we tried to  
12 identify that this standard was too strict and that if  
13 there was an easier way, we need X, Y, and Z. How you  
14 submit that, well, that's up to the TGRA of gaming  
15 operation to establish standards to do so.

16           So if there's any areas that you can think of,  
17 or suggestions that you can make, we definitely invite  
18 those comments.

19           Any other comments?

20           (No response.)

21           COMMISSIONER LITTLE: You know, an area in  
22 Oklahoma that was raised, when we were talking about  
23 Section 543.4, and that's the small and charitable  
24 calibration section exception.

25           We're looking at this as a way of streamlining

1 it; however, it was identified to us that that could  
2 pose some problems, removing the charitable exception  
3 or molding that into the small operation section.

4 Does anyone have any comments on that? This is  
5 an area that we're just trying to think of a way to  
6 streamline the regulation; however, we don't want to do  
7 anything that's going to cause any problems.

8 We did hear, like I said, in Oklahoma that this  
9 could cause some issues for us in charitable  
10 operations. And I'm not sure if anybody has any  
11 thoughts or ideas about that. We definitely would be  
12 interested in hearing that.

13 MS. HOMER: I guess what the issue is, of what  
14 was being raised in Oklahoma, is that it's because the  
15 language is there -- like some tribes do regulate like  
16 the villages or the subcomponents of the tribe that do  
17 gaming charitably. They're not ponying up any of their  
18 money back to the Tribal Government, but they're doing  
19 it for their charitable purpose.

20 And the fact that the language is just there,  
21 you know, clarifies that the Tribal Gaming Regulatory  
22 Agency has that -- or the tribe has the authority to  
23 regulate those kinds of charitable activities.

24 And so whether that is, in fact, by operation  
25 of law, the case, to the removal of the language.

1 There was concern that it would look like that  
2 authority has been taken away.

3 And then the more mothers can't have their  
4 Bingo or don't have to submit to the rulemaking  
5 authority of the tribe. And that could become an  
6 issue. So that's what that was about.

7 COMMISSIONER LITTLE: We certainly don't want  
8 to raise an issue that would have to be addressed in  
9 the future down the road. So I appreciate that.

10 Any other comments?

11 (No response.)

12 COMMISSIONER LITTLE: We might have to ask  
13 Tracie to start pulling out questions, because she can  
14 do it.

15 (Laughter.)

16 COMMISSIONER LITTLE: Well, if there's no  
17 objection from the Chair, I'd say we probably will  
18 break for lunch. The schedule has us coming back at  
19 1:30, and going until 4:00. Like we had said earlier,  
20 if there are no other comments, we will probably end  
21 early today.

22 We'll come back at 1:30. In the event that  
23 anyone was planning to be here in the afternoon to make  
24 sure that they can make a comment for the record.

25 However, if you have nothing else to add,

1 it doesn't necessarily mean you have to come back at  
2 1:30. We will be here. We'll open the floor up for  
3 additional comments at 1:30, for either 547 or 543.  
4 If there are no comments, we will probably adjourn and  
5 conclude the consultation.

6 So feel free to come back; however, if you've  
7 said everything you needed to say, you don't have to  
8 stay for after the lunch. So I'll turn it back over to  
9 the Chair then for the break.

10 CHAIRWOMAN STEVENS: Okay. Well, if it is the  
11 case that we don't see you after lunch, I want to thank  
12 everybody for attending.

13 I really hope that this has been helpful and  
14 that you provide your comments, in any fashion as it  
15 suits you, and you consider how these may affect your  
16 tribe, specifically.

17 That is really sort of what we were trying to  
18 get at with our preamble to these, so that we get, and  
19 be mindful, of our responsibility to all tribes, and a  
20 bigger picture of how this affects tribes,  
21 specifically.

22 So we wish you well if you've traveled far.  
23 If I don't see you after lunch, please travel safe, and  
24 the best to you and yours.

25 If you have any question, you can always call

1 and ask, e-mail and ask. And if you do come back,  
2 we'll see at 1:30.

3 So plenty of places to have meals around here,  
4 and I'm sure the Gila River Indian Community would be  
5 happy to have you.

6 So thank you and we'll either see you after  
7 lunch or not. Thank you.

8 (A recess was taken from 11:46 a.m. to  
9 1:41 p.m.)

10 CHAIRWOMAN STEVENS: I see many people have  
11 returned. I hope you all had a pleasant lunch.

12 I want to remind everybody, there are  
13 refreshments back there. Please feel free.

14 So with that, I'm just going to turn it over to  
15 you or anyone on the floor who wants to make a comment  
16 or has questions.

17 COMMISSIONER LITTLE: Any other questions on  
18 anything?

19 MS. HOMER: You paused just a little bit too  
20 long.

21 CHAIRWOMAN STEVENS: Too long. You missed it.  
22 I'm sorry.

23 (Laughter.)

24 MS. HOMER: All I wanted to say is thank you  
25 very much. I thought this was a very productive



1 discussion. I really appreciate the approach and the  
2 style.

3 I want to thank you and the NIGC staff for  
4 really -- I know what a humongous effort your  
5 regulatory review has been. I know it's probably kept  
6 you away from your families and your kids. Just thank  
7 you all very well for your hard work.

8 CHAIRWOMAN STEVENS: Well, thank you. We  
9 appreciate that, and it's all part of what our job is.

10 I do want to echo your sentiments towards our  
11 staff. You all have really stepped up. But keep in  
12 mind, they have their regular duties that they have to  
13 take care of and have stepped up on the regulation and  
14 joining us on the road and managing all the comments.

15 They've done a really great job. So I  
16 appreciate it. Thank you.

17 COMMISSIONER LITTLE: Thank you, Liz.  
18 I appreciate it.

19 Any other questions or comments?

20 (No response.)

21 COMMISSIONER LITTLE: Okay. Well, I guess I'll  
22 let the Chair close out our meeting.

23 Just before I go, I just want to thank  
24 everybody for attending. I wish everyone safe travels  
25 home.

1 I want to thank the staff and echo what the  
2 Chair was saying. You know, it's easy for the  
3 Commission to sit up here with all these presentations.  
4 But the staff does a lot of work. They're all  
5 dedicated.

6 And I've said this on a number of occasions,  
7 you know, I think one of the biggest assets that we've  
8 inherited from previous Commissions is our staff. And  
9 we're very grateful for the dedication and the hard  
10 work that they provide the Commission and this industry  
11 every day. So I want to thank them.

12 And I want to thank you all for attending and  
13 remind everybody that we're coming close to the 31st of  
14 July. Please send in those comments.

15 If the discussion draft coming through was any  
16 indication, you set the standards very high of the  
17 quality of comments that were sent in. So we'll  
18 probably be expecting the same type. So please send  
19 those in as soon as you can. So thank you.

20 CHAIRWOMAN STEVENS: All right. And with that,  
21 I'll go ahead and close this consultation.

22 Just so you know, the next consultation will be  
23 at Cache Creek, outside of Sacramento. That will be on  
24 July 11th.

25 The one after that will be on July 19th at

1 Squaxin Island, Little Creek Casino during the  
2 Northwest tradeshow.

3           Feel free to attend or, as always, we put the  
4 transcripts on our webpage. So if you're not able to  
5 attend, you can see what happened.

6           Please do submit your comments.

7           And with that, safe travels and thank you for  
8 attending.

9           (The meeting concluded at 1:45 p.m.)

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