

NATIONAL INDIAN GAMING COMMISSION  
CONSULTATION MEETING

Phoenix, Arizona

March 27, 2013

1:12 p.m.

Job No. NJ1625154

REPORTED BY:

Cindy Bachman

Certified Reporter No. 50763

1 THE NATIONAL INDIAN GAMING COMMISSION,  
2 CONSULTATION MEETING, taken on March 27, 2013,  
3 commencing at 1:12 p.m. at the PHOENIX CONVENTION  
4 CENTER, 100 North Third Street, Room 221 AB, Phoenix,  
5 Arizona, before CINDY BACHMAN, Arizona Certified Court  
6 Reporter, in and for the State of Arizona.

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COMMITTEE MEMBERS PRESENT

Tracie Stevens, Chairwoman

Daniel Little, Associate Commissioner

Alison Grigoinis, Staff Attorney for NIGC

Eric Shephard, Assistant General Counsel for NIGC

Christinia Thomas, Deputy Chief of Staff.

Sarah Walters, Counsel to the Chairwoman

Michael Odie, Director of Public Affairs

Lance Vallo, Region Director, NIGC, Phoenix

Sally Virag, Associate Assistant

1 (The meeting commenced at 1:12 p.m.)

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3 CHAIRWOMAN STEVENS: Welcome to the NIGC  
4 Consultation on our two proposed rules 543 and 547, as  
5 well as our draft consultation policy.

6 Let's start with -- we don't have anyone here  
7 for a welcome, so my apologies.

8 And also I want to apologize. We had a mishap  
9 with the shipment of our material that is normally  
10 here. And it's not here, so I apologize. But all of  
11 this information can be found on the website, and it's  
12 downloadable. And the comment period runs into April.

13 So, again, my apologies on behalf of the  
14 Commission. We had a little snafu.

15 So why don't we start with introductions.  
16 Let's start with those in the room. We'll start to my  
17 left, and we'll go around into the back of room.

18 MS. POUST: Hi. Terry Poust. I'm an attorney.

19 MR. PLATA: John Plata with Hobbs & Strass.

20 MS. GREEN: Nancy Green with Green Law Firm.

21 MS. HOMER: Elizabeth Lohah-Homer, Homer Law  
22 charter.

23 MS. MORONGO: Shelia Morongo, Oklahoma Indian  
24 Gaming Association.

25 MS. THOMAS: Paulene Thomas, Navajo Nation

1 Gaming Regulatory Office.

2 MS. CHINO: Good afternoon. Carleen Chino,  
3 Navajo Gaming Regulatory Office.

4 MR. MANUELITO: Henry Manuelito of Bishop  
5 Pauite, California.

6 MS. BOBTAIL BEAR: Marianna Bobtail Bear,  
7 Executive Director of the Arizona Gaming Office.

8 MR. WATERS: Dwayne Waters, Executive Director  
9 of the Quechan Gaming Agency.

10 MR. SIMMONS: Brad Simmons, Nottawaseppi Huron  
11 Band, the Gaming Commission Chairman.

12 MR. CHISSOE: Richard Chissoe, Pueblo of Laguna  
13 Gaming Control Board.

14 MR. CONRAD: Randall Conrad. I'm the new  
15 training manager for NIGC.

16 MR. NORMAN: William Norman with Hobbs &  
17 Strass.

18 MR. WEBSTER: Joe Webster, also with Hobbs &  
19 Strass.

20 MR. ELSON: Jack Elson with the Gaming Board.

21 MS. ECHOHAWK: Lael Echohawk, Quinnah Tribe.

22 MR. HOLMES: Daniel Holmes with Rubin Brown.

23 MR. HOFSTETTER: Andrew Hofstetter, Soboba  
24 Gaming Commission.

25 MR. SANCHEZ: Vanchez Sanchez, Pueblo

1 Regulatory Agency.

2 CHAIRWOMAN STEVENS: Well, welcome. And we'll  
3 go ahead and introduce our staff. We'll start to the  
4 left again.

5 MR. SHEPHARD: Eric Shephard, Assistant General  
6 Counsel for NIGC.

7 MS. GRIGONOS: Alison Grigonis, staff attorney  
8 for NIGC.

9 MS. THOMAS: Christinia Thomas, Deputy Chief of  
10 Staff.

11 MS. WALTERS: Sarah Walters. I'm a member of  
12 the Cheyenne River Sioux Tribe, and I'm the counsel to  
13 the chairwoman.

14 MR. VALLO: Lance Vallo, Region Director, NIGC,  
15 Phoenix.

16 MR. ODIE: Good afternoon. Welcome.  
17 Michael Odie, Director of Public Affairs.

18 CHAIRWOMAN STEVENS: And we have Sally who's  
19 outside taking care of registration. She's the  
20 administrative assistant here in the Phoenix region.

21 My name is Tracie Stevens.

22 And why don't you go first.

23 MR. LITTLE: My name is Dan Little. I'm the  
24 associate commissioner here with the NIGC. And I want  
25 to welcome you all today.

1           CHAIRWOMAN STEVENS: I'm Tracie Stevens. I'm  
2 the chair of the NIGA and also a member of the Tulalip  
3 Tribe of Washington State.

4           And today, I welcome everyone. I appreciate  
5 it's probably been a very long week for all of you.  
6 We do try to coordinate with widely attended Tribal  
7 gatherings for consultations or other meetings that we  
8 may have.

9           Yesterday, there were some questions during my  
10 presentation to the general membership about  
11 sequestration. What we'd like to do is -- because we  
12 have this time scheduled for an official consultation  
13 with Tribes, we'll go ahead and take care of that. And  
14 for those who do have questions, we can talk about it  
15 when we're done with the consultation meeting.

16           So with that, we'll go ahead and get started.  
17 Am I missing anything? It's been a long couple of  
18 days, and I'm sure it has been for all of you. So I  
19 appreciate you staying at the end of the week.

20           Tribal consultation meetings are between Tribal  
21 government and the Federal government only. Only  
22 Tribes and their designees can attend and participate  
23 in these meetings, and they are not open to the public  
24 or to the press.

25           This is following along with the executive

1 order on Consultation 13175 that President Obama  
2 reaffirmed in 2009, in particular, under Section 3, in  
3 determining whether to establish Federal standards --  
4 to consult with Tribal officials as to the need for  
5 Federal standards or other alternatives.

6 And so as has been our commitment as a  
7 Commission, we will review every comment that's made  
8 here, also those that are submitted to us in writing.  
9 And just know that the commissioners do read all of our  
10 comments. And they are all posted on the website so  
11 that we have a clear and transparent process.

12 The transcripts will also be posted on the  
13 website, as will any written comments that are  
14 submitted for this rulemaking process or with regard to  
15 the consultation policy.

16 Before we start on this, I do want to remind  
17 everybody that we do have a transcriptionist here.  
18 This is Cindy back here. She is transcribing so that  
19 we have a record of this that we can post for those who  
20 are unable to attend the consultation meetings.

21 So when you do have a comment, we do  
22 respectfully ask that you, one, use a microphone -- and  
23 we will have to share these microphones that are at the  
24 table. I just usually put the stand aside because it  
25 tends to get in the way -- and also state your name and

1 the Tribe that you represent here today.

2 So with that, I do want to turn it over to  
3 Alison and Eric to do the first portion of our  
4 consultation, which will be on 543 and 547.

5 MS. GRIGONOS: Good afternoon again.

6 We did a major overhaul of 543 and 547, as you  
7 know, back in the fall, in September. And after we put  
8 that into place, we realized that there are just a  
9 couple gaps that we had as it relates to kiosks. So we  
10 wanted to go ahead and make sure that the standards  
11 that we were putting in place for kiosks were going to  
12 be consistent with card games and with player  
13 interfaces.

14 So these new proposed rules were published  
15 February 20, 2013, and our comment period is going to  
16 close April 22, 2013.

17 So they're pretty basics. I'm going to just  
18 walk right through each one of the proposed rules.  
19 The additional standards that we're going to have are  
20 going to be for Drop and Count and for surveillance.

21 So the first proposed rule is the definition  
22 for a currency cassette. A locked compartment that  
23 contains a specified denomination of currency.  
24 Currency cassettes are inserted into kiosks, and they  
25 allow them to dispense currency.

1           We have put forward this definition because we  
2 refer to currency cassettes throughout the Reg that we  
3 published back in the September. So we just wanted to  
4 break that out into a new definition.

5           So moving forward, the next proposed rule we  
6 have is for Drop and Count. The additional standards  
7 mirror those for card games and player interfaces, as I  
8 mentioned, and there's just a few kiosk-specific  
9 provisions I want to go over.

10           The controls and the procedures to be  
11 established must also include the fill process; three  
12 agents must be involved in the kiosk drop; and redeemed  
13 vouchers and pulltabs (if you have kiosks that  
14 distribute pulltabs) collected from the kiosk drop must  
15 be secured and delivered to the appropriate department  
16 for reconciliation.

17           Oftentimes that's accounting, but, again,  
18 that's up to the Tribes to determine.

19           So moving forward to our next proposed rule.  
20 We have another MICS for Drop and Count. This is  
21 required to run a report prior to the kiosk processing  
22 any transactions every time the currency cassettes or  
23 the financial instrument storage components are  
24 accessed.

25           And the next proposed rule talks about what's

1 going to be included in that report. So the kiosk  
2 report has to include the date and the time; the unique  
3 asset ID of the kiosk; the unique idea of each  
4 financial instrument storage component in the kiosk;  
5 the total amount of currency dispensed; the total  
6 number of bills dispensed by denomination; the total  
7 dollar amount of vouchers accepted; and the total  
8 number of vouchers accepted.

9 And if anyone has any questions, feel free to  
10 jump in. I don't think we mentioned that, but jump in  
11 anytime.

12 So moving forward, we have surveillance  
13 standards for kiosks. Cameras with sufficient clarity  
14 will be required for kiosks. And the rule is the  
15 surveillance system must monitor and record a general  
16 overview of the activities occurring at each kiosk with  
17 sufficient clarity -- and, again, we broke that  
18 definition out last time -- to identify the activity  
19 and the individuals performing it, including  
20 maintenance, drop or fills, and redemption of wagering  
21 vouchers or credits.

22 So that is the end of 543. I don't know if you  
23 have any comments with regards to 543 before I move  
24 into 547.

25 CHAIRWOMAN STEVENS: Do we have any comments or

1 questions about 543?

2 Did you raise your hand, Joe?

3 MR. WEBSTER: Joe Webster on behalf of the  
4 Seminole Tribe of Florida.

5 We're going to be submitting some detailed  
6 written comments. We would certainly like the idea in  
7 terms of coming up with internal controls for kiosks,  
8 but we do think there are a number of areas that  
9 probably need to be clarified.

10 Just a few items. One, in terms of kiosks,  
11 there are number of different types of kiosks. And the  
12 way that it's defined right now, it may not be as  
13 precise as what it could be, in terms of the  
14 promotional kiosk versus a kiosk for other purposes.

15 Also with currency cassettes. In some cases,  
16 rather than being locked, we know that those also could  
17 be secured with numbered seals. So the proposed rule  
18 would seem to require that they be locked. And in  
19 terms of industry practice, we're not sure that's  
20 necessarily consistent.

21 In terms of other items, you know, I think in  
22 terms of having a requirement of having three people  
23 for the count, and, again, especially in smaller  
24 facilities, that may be excessive.

25 But in general, we'll be providing detailed

1 written comments to follow up. But I just wanted to  
2 let you know we do have some concerns at our casino.

3 CHAIRWOMAN STEVENS: Okay. Thanks, Joe.

4 We have heard from others at the Oklahoma  
5 consultation similar comments as yours, in particular  
6 about the number of individuals that need to be there  
7 and any suggestions about coordinating it or  
8 paralleling it to other parts of 543 or the TIERS, for  
9 that reason that there are some facilities that just  
10 are not going to have that number of individuals.

11 So we certainly have heard that comment, and we  
12 welcome more comments and any Seminoles-suggested edits  
13 or revisions.

14 MR. WEBSTER: Okay. Thank you.

15 MS. GRIGONOS: Anyone else before I move on to  
16 547?

17 547 is pretty basic. We were just kind of  
18 correcting an oversight on our part. We're just  
19 bringing the charitable gaming threshold up to  
20 3 million. That's just to be consistent with 543, as  
21 we published back in September.

22 And so the comments are due on that April 8,  
23 2013. And, again, just to create that consistency with  
24 543.

25 So we'll take a break here for a quick second

1 before I go into the consultation policy.

2 CHAIRWOMAN STEVENS: Any other comments on  
3 either Part 543 or 547?

4 Okay. We'll go ahead and go onto the draft  
5 consultation policy. I know that there are some  
6 concerns about why this is so different than the one  
7 that was published in 2011.

8 In 2011 -- and I had been a part of this when I  
9 worked over at DOI. It was the Department of  
10 Interior's effort to comply with President Obama's memo  
11 on Tribal consultation that was written and signed in  
12 2009, directing all agencies and departments to consult  
13 with Tribes and develop a consultation policy and  
14 progress.

15 When I came over to the NIGC, part of the  
16 Tribal consultation team over there when they were  
17 developing their policy included all the Bureaus, and  
18 NIGC had started to participate in the early  
19 developmental stages.

20 The department had put together a Tribal  
21 Advisory Committee with individuals from each of the  
22 BIA regions. And they had drafted that very similar to  
23 what we had published in 2011.

24 As the Tribal advisory committee progressed in  
25 their work, they made, what would be, I think,

1 revisions that were meant to streamline and use more  
2 plain language and just be more concise and to the  
3 point about what the Department of Interior's policy  
4 would be.

5 And that policy was adopted in -- I want to say  
6 that December of 2011, and the secretarial order was  
7 issued.

8 Now, certainly the NIGC, while we are under the  
9 Department of Interior, we're not part of their  
10 department's manual and are not necessarily subject to  
11 the secretarial orders.

12 So when the secretary and the Tribal Advisory  
13 Committee had come up with the final draft and they all  
14 agreed upon it, Secretary Salas had already ordered a  
15 secretarial order having all departments do their  
16 portion of the department's policy and develop their  
17 own practices, but having the department's guidelines  
18 in their policy as the framework for what their bureau  
19 or their agency will do.

20 With that, we --in an effort to make the lives  
21 of Tribes better when you have to consult with agencies  
22 and bureaus within the Department of Interior, which we  
23 are -- try to remain consistent.

24 But at the same time, preserve our authorities  
25 and our responsibilities under AGRA. So we did adopt a

1 number of the things that came from the department's  
2 policy that exists today, but also retained those  
3 authorities and responsibilities that we have under the  
4 act.

5 And so this all was an effort to try to create  
6 some consistency so the Tribes have something similar  
7 to deal with.

8 Now, our actions, I think, have been -- with  
9 regard to our practices and consultation -- pretty  
10 consistent over the past two and a half years, so you  
11 know what to expect from us.

12 So we're trying to solidify what it is that  
13 we're doing and put it in writing and create some  
14 benchmarks for ourselves as well. But do it in a way  
15 that's very clear and, frankly, just remove a lot of  
16 language that might have been repetitive and just to  
17 pair it down.

18 While we were deciding to do this, we also  
19 heard from Tribes that there are different consultation  
20 practices across the administration. And certainly  
21 that weighed in our decision to try to streamline the  
22 process and mirror or parallel, where appropriate,  
23 DOI's policy. So that's where this document comes  
24 from.

25 Alison and Eric and Sarah were instrumental in

1 coordinating this. So I'm going to hand the microphone  
2 over them, and they'll go through, basically, the  
3 highlights of what the current policy is.

4 MS. GRIGONOS: Thanks.

5 So Tracie pretty much walked you through the  
6 overview that I was going to talk about --

7 CHAIRWOMAN STEVENS: Oh, sorry.

8 MS. GRIGONOS: No, no, no. That's prefect.  
9 -- and elaborated a little bit more on each  
10 point.

11 But just to reiterate, try to create some  
12 compatibility and consistency for Tribes, try to  
13 streamline the concepts that we had introduced back in  
14 2011.

15 So I'm just going to walk through it section by  
16 section. And, again, if you guys have any comments or  
17 question as relates to each section or the policy  
18 overall, please feel free to jump in and interrupt me.

19 So starting with the Preamble. Again, it's  
20 just an introduction as to what is the purpose of  
21 consultation.

22 We talk about, where does the responsibility to  
23 consult come from? Why does NIGC need to recharge  
24 their Tribes? Well, we recognize that we have that  
25 responsibility to consult, and it's based on the

1 U.S. Constitution. It's based on Federal treaties.  
2 It's based on statues, executive orders, and policies.

3 And, again, we reference the Executive Order  
4 that Tracy mentioned earlier, the 13175. So all of  
5 that kind of comes together and creates our  
6 responsibility on us to reach out to you guys before we  
7 put forth anything.

8 And, again, it does recognize the Tribal right  
9 to self-governments and to sovereignty.

10 So moving forward to the next section, the  
11 Guiding Principle section. So consultation is  
12 hopefully going to government-to-government  
13 consultation between Tribal officials and Commission  
14 officials.

15 So the Commission is here before you today, and  
16 you as Tribal leaders are here, and we're reaching out  
17 to you.

18 So what do we want the consultation process to  
19 look like? Some objections for the process is what  
20 we've put in this section.

21 We hope that we demonstrate meaningful  
22 commitment, and we ensure continuity. We emphasize  
23 trust, respect, and shared responsibility. Open and  
24 transparent communication. And we've conducted all of  
25 this in good faith.

1           As far as the goals for consultation, what do  
2 we hope to get out as a result of consultation? We're  
3 hoping that it leads to effective, efficient Commission  
4 operations and governance practices.

5           And we're hoping that it ensures federal action  
6 is achievable, it's comprehensive, long-lasting, and  
7 that it reflects Tribal input.

8           Moving forward to the Definition section. That  
9 section is pretty basic, but I just want to touch on  
10 probably the most important part of that section.

11           When is consultation triggered? So that is  
12 broken down into a Commission action with Tribal  
13 implications. And, again, this is similar to our 2011  
14 draft.

15           So any Commission regulation, rulemaking,  
16 policy, guidance, legislative proposal, or operational  
17 activity that may have a substantial direct effect on  
18 an Indian Tribe on matters including, but not limited  
19 to, the ability of an Indian Tribe to regulate its  
20 Indian gaming; an Indian Tribe's formal relationship  
21 with the Commission; or the consideration of the  
22 Commission's trust responsibilities to Indian Tribes.

23           So that's what's going to trigger consultation.  
24 However -- and this relates to just our role as a  
25 regulator -- it does not include enforcement actions or

1 litigations or settlement negotiations or where a court  
2 has decided that we just can't speak about something.

3 That has been consistent across the board with  
4 our previous policies and that was also in our draft  
5 policy. It's also in the DOI policy, but we've  
6 included enforcement actions.

7 So moving to the next section, the Accounting  
8 and Reporting section. This section really codifies  
9 what we've been doing as a Commission during our  
10 consultation process.

11 As Tracy outlined when we started, we have  
12 someone transcribing every single consultation. We  
13 post that to the website. We take all your comments,  
14 and we post those to the website. That way, even if  
15 you're not able to attend in person, you get a sense of  
16 what's going on.

17 And then we also put out our proposed rules and  
18 also our final rules. We really just wanted to put  
19 that in writing and kind of caption what we've been  
20 doing so far.

21 In the next section, we have the Training  
22 section. And now with Mr. Randy on board, he'll be  
23 able to help us with this section.

24 The Commission plans to develop its own  
25 training for NIGC employees. We always try to reach

1 out for people that have knowledge of Indian gaming and  
2 Indian Tribes, but sometimes people bring some other  
3 skills to the table, and we're interested in helping  
4 them learn a little bit more about Tribal Government.

5 So our goals for the training is that it will  
6 promote consultation, communication, collaboration, and  
7 other interaction with Tribes. It will outline and  
8 reinforce the Commission's duties concerning Indian  
9 gaming. And it will describe the legal trust  
10 obligation of the Federal-Tribal relationship. Not  
11 everybody's familiar with that.

12 And it will highlight and provide the  
13 knowledge, skills, and tools necessary for  
14 collaborative engagement between Tribal representatives  
15 and Commission staff engaged in the consultative  
16 process with attention to the unique distinctions  
17 within Indian Country.

18 So we look forward to working with Randy to put  
19 that together for us.

20 Moving on to the next section, this is  
21 Innovative and Effective Consultation Practices. And  
22 really this talks about how will the Commission caption  
23 Tribal input?

24 So we plan to host regular meetings between the  
25 Commission and Indian Tribes. You've probably been

1 familiar with the number of meetings that we've already  
2 had.

3 We plan to communicate through a regular  
4 gathering of Indian Tribes to discuss improving  
5 consultation practices and procedures, similar to what  
6 we're doing today. We want to try to tie our  
7 consultations into general meetings where Tribal  
8 leaders are getting together, such as NITA and NCA,  
9 et cetera. And we try to attend also regional  
10 gatherings as well. Like I know they were out of  
11 Palm Springs last week meeting with you all.

12 So we hope to solicit recommendations from  
13 Indian Tribes for the initial development of  
14 performance measures, and, thereafter for the  
15 evaluation of consultation practices.

16 The next section is the Consultation  
17 Guidelines. So when the Commission is considering a  
18 Commission action with Tribal immigration, what is the  
19 consultation process going to look like? What are the  
20 various stages?

21 So there's the initial planning stage. There's  
22 that 30-day notice. We put our notice out that we were  
23 going to plan to meet here with you 30 days ago. And  
24 that's just going to let you know there's going to be  
25 an opportunity to consult on something.

1           And then we move into the proposal development  
2 stage. This is where we work with Tribes. We give  
3 consideration to the Tribal schedules, coordinate with  
4 other national conferences, such as NCAI, NIGA, USET,  
5 et cetera.

6           And there's going to be multiple processes for  
7 capturing Tribal input. When we were putting together  
8 543 and 547 back in the fall, we worked with a lot of  
9 Tribal groups that work on the Tribal Advisory  
10 Committee to work on the rules that we ended up going  
11 final with.

12           And so the last stage is really the  
13 implementation stage of the Final Federal Action. This  
14 is where the Commission will consider whether we need  
15 to do more training to let you guys know how the  
16 regulations are going to work in practice. And, again,  
17 this is where you guys can reach out to us and let us  
18 know if you need more assistance in that area.

19           And so the final section I'm going to go over  
20 is the Limitation section, and I touched on this  
21 earlier in the definition section. We really just  
22 modified the DOI policy to reflect the Commission's  
23 role as a regulator.

24           And, again, it excludes consultation on  
25 enforcement actions, litigation, and administrative

1 appeals in front of the Commission.

2 So that really wraps up the consultation  
3 process and the policy. I just have a final slide and  
4 it's really if you need to contact us to submit your  
5 public comments, you can email it to us, you can mail  
6 them to us, you can drop them off in person, or you can  
7 fax it to us.

8 But I'll turn it back over to you guys and see  
9 if you have any questions or comments for us.

10 CHAIRWOMAN STEVENS: Okay. Do we have any  
11 questions or comments on what Alison has discussed or  
12 if there any observations that you want to make?

13 MS. HOMER: As I indicated yesterday, I think  
14 that your former consultation policy was probably the  
15 best one I've ever seen drafted by a Federal agency.

16 And I sat in your role. I was very  
17 instrumental in the development of the consultation  
18 policies during the Clinton administration for the  
19 Interior Department, very much a part of developing  
20 policies for the NIGC during my term in NIGC.

21 And I just felt very disappointed to see the  
22 good language that you had in your former policy that  
23 really reflected the -- not only the relationship  
24 between the NIGC and Tribal governments, but also set a  
25 policy tone for the agency that I thought was very

1 positive and very favorable.

2 So I felt, when I read this, that Tribes had  
3 been consulted with that policy. I think that you  
4 probably got a lot of favorable feedback about the  
5 policy. And the fact that Tribes go to the effort to  
6 give feedback and input and be in favor of something  
7 the agency has done should be more meaningful than  
8 streamlining it to look like the Interior Department's  
9 policy.

10 During my tenure on the NIGC, I felt very  
11 jealous and guarded very much the independence of the  
12 NIGC. I believe that the NIGC is an independent  
13 regulatory agency, and I think that that's a very  
14 important thing.

15 And you're not a subordinate entity of the  
16 Department of the Interior; although, you are  
17 administratively attached to the Department of the  
18 Interior. And I don't think that you have to just  
19 adopt the same policies as the Interior Department, but  
20 should have policies that really reflect the very  
21 unique role that the NIGC has.

22 You're kind of regulators with Tribal  
23 governments. You have shared regulatory  
24 responsibilities, and I thought the earlier policy  
25 reflected that in a way that the current policy does

1 not.

2 And that is not to be mean or to discount the  
3 work of the drafters of the new policy, but just to say  
4 that you did a real good job, and I wish that you would  
5 readopt that approach and that policy because it was a  
6 really, really good effort.

7 CHAIRWOMAN STEVENS: Thank you, Liz. Will you  
8 or any of those that you represent be making written  
9 comments?

10 MS. HOMER: Yes.

11 CHAIRWOMAN STEVENS: Okay. That would be  
12 great. And if there are particular areas from the  
13 previous policy that you want to emphasize that may be  
14 missing from this current policy, that would be very  
15 helpful to us.

16 We certainly will re-review -- although, I know  
17 that we did when we wrote this one -- the comments that  
18 were made on the previous policy.

19 I do agree with you. We are an independent  
20 regulatory agency, but as a member of this  
21 administration, we are very aware of, and what we know  
22 to be true for Tribal leaders is, there's a lot of  
23 consultation going on.

24 And that's a good thing. It's exactly what  
25 Tribal leaders wanted, whether they're talking to Noah,

1 whether they're talking to the BIA, whether they're  
2 talking to energy, education.

3 We are a member of this administration and  
4 trying to keep consistent and also trying to make your  
5 jobs as Tribal leaders a little easier by having  
6 something that goes along with the administration's  
7 practices on the policy.

8 So we do look forward to your comments from the  
9 Tribes that you represent so that it can inform our  
10 policy and where we have deviated from DOI's policy,  
11 where we have -- in a number of instances actually, if  
12 you read their policy, we've already done that. So  
13 we're certainly open to the idea of doing more of that.

14 So do we have other comments?

15 MR. PLATA: Hi. John Plata with Hobbs &  
16 Strass.

17 I just wanted to point out that the changes for  
18 543 and 547 have definite deadlines for submission of  
19 comments, whereas the consultation policy doesn't  
20 specify a deadline for submission of comments.

21 I understand from Rita that you're treating it  
22 the same as a rulemaking, and the deadline will be  
23 April 22nd also for these. But that isn't anywhere on  
24 your website. If you could post that, it would be very  
25 helpful.

1                   CHAIRWOMAN STEVENS: I apologize for that.  
2 We'll correct that.

3                   We thought it was on the website in the press  
4 release. But we'll double check and make sure that  
5 that information is there. And if it's not, I  
6 apologize.

7                   MS. HOMER: Just with respect to the kiosks.  
8 I just think that you might want to consider on the  
9 kiosk rule the fact that it really is not the same as  
10 the gaming machine drop, and to basically mirror those  
11 procedures and require the additional personnel, that's  
12 a cost to the operation.

13                   Basically, for most cases, we're dealing simply  
14 with canceled tickets that have already been accounted  
15 for in the system.

16                   And you might want to consider -- because  
17 kiosks can be different. You can have bill breaker,  
18 ATM/TITA systems, and those kinds of things -- to open  
19 up for a little flexibility so that we can tailor it to  
20 what our particular machines are doing. And I think  
21 that this rule does not really allow for that.

22                   CHAIRWOMAN STEVENS: Okay. That's good to  
23 know.

24                   And, again, I know Joe Webster had mentioned  
25 that as well. We look forward to some written comments

1 that could describe to us that particularly situation  
2 for you and maybe some suggestions on how we might be  
3 able to cast a broader net over different types of  
4 kiosks.

5 Any other comments on 543 or 547 or on the  
6 draft consultation policy? Again, it's all on our  
7 website, and you can pull down drafts of both.

8 The comment period begins --

9 MS. GRIGONOS: April 22nd.

10 CHAIRWOMAN STEVENS: -- April 22nd for both.  
11 So we're about three weeks away. It's been out there.  
12 It's a 60-day comment period, I think, as usual.

13 So if you do have any questions, the email and  
14 the mail go directly to Sarah. And Sarah goes through  
15 all of them. We will see all of them.

16 Dan, did you want to make any comments on  
17 either of these?

18 MR. LITTLE: No.

19 CHAIRWOMAN STEVENS: Okay. You are awaiting  
20 reappointment commissioner.

21 All of these will come to our personnel here,  
22 and we'll go over all of the comments.

23 And as we've demonstrated in the past, we're  
24 always open to hear what Tribes have to say, especially  
25 from a practical standpoint and having the

1 responsibility for regulatory oversight for all Tribes  
2 across the country, it's helpful to hear different  
3 viewpoints and how what we're proposing, whether it's a  
4 policy or whether it's a rule, affects each Tribe  
5 because we do get this sort of diverse view of how what  
6 we're proposing is affecting everybody across the  
7 country.

8           So please do provide comments. If you do have  
9 any questions, you can call Sarah. You can talk to us.

10           And Allison had mentioned this previously, that  
11 when we do put out new rules, we are also developing  
12 training and guidance, based on really some of the  
13 questions that we get back from Tribes. And that  
14 informs us, and it also creates training opportunities,  
15 which we've already embarked upon with 543 and 547.

16           So your questions, your phone calls to us, your  
17 emails to us all help guide what we do. So please feel  
18 free. Don't hold back -- not that you would.

19           And on that note...

20           MS. HOMER: Yes, on that note. I'm so glad you  
21 said that.

22           There is a question that's kind of not proposed  
23 for this particular consultation, but it's one I would  
24 like to throw onto the floor.

25           As we go into full mode implementation of the

1 Class II MICS, there is a question -- at least there's  
2 a question in my mind because most of my clients do not  
3 have either a Class II or a Class III facility. We  
4 have mixed Class II/Class III.

5 And what we've been trying to figure out -- and  
6 we also don't have a segregation. So this half of our  
7 casino is Class II, and this is Class III. We have a  
8 unified gaming floor.

9 And it is not clear from the regulations what  
10 to do in the event of a mixed Class II or Class III  
11 facility, which Part 542 or Part 543 applies.

12 It seemed that there are enough differences  
13 between 542 and 543 that we really need to figure that  
14 out if we're really going to implement the new MICS by  
15 the beginning of the fiscal year, because it is tricky  
16 when you go into implementation. So guidance with that  
17 would be welcome.

18 CHAIRWOMAN STEVENS: We do get that question.  
19 And I don't know if either Sarah or Eric can respond to  
20 that.

21 But we are also doing trainings on this, and we  
22 started in -- where did we start? I know Oklahoma.  
23 We've been to Oklahoma. And there was another  
24 location.

25 But we're continuing those to make clear

1 because we aren't clear how to implement these and  
2 answer some of the questions that Tribal regulators and  
3 Tribal operators have about this.

4 It probably means we're going to get a lot of  
5 questions about TICS. So I'll let Eric respond to your  
6 comment.

7 MR. SHEPHARD: I don't know if the TICS provide  
8 an opportunity to harmonize some of those standards in  
9 the interim. Do they?

10 MS. HOMER: Well, I think they could. I mean,  
11 I think that there's a bunch of different options and  
12 ways you could go.

13 Like if the NIGC, for example, were satisfied  
14 that we could use, in our TICS, Part 543 for our entire  
15 gaming operation, you know, we could do that.

16 I mean, there's many areas that it probably  
17 makes a lot of sense. Credit is one of those areas,  
18 where it's really not that big of a difference, but  
19 there are differences. And so we could harmonize it  
20 that way.

21 We could pick one or the other, but just kind  
22 of stick on Class II things, just stick to the things  
23 that are purely Class II, you know, like on the Bingo  
24 stuff and the Bingo section.

25 But on Drop and Count and all of those sections

1 that are generic, we could adopt one or the other or do  
2 a blend of both. But what we don't want to do is like  
3 pick that path, put it in our TICS, and then find  
4 ourselves out of sync with what you guys are thinking.

5 MR. SHEPHARD: I think generally we've been  
6 recommending that folks try to do that through their  
7 TICS. And there may be other things that they have to  
8 bring into alignment there, too, that might be in  
9 compact or elsewhere in Tribal regulations.

10 But, hopefully, the TICS would provide an  
11 opportunity to harmonize all those competing standards.

12 MS. HOMER: And you wouldn't see that as an  
13 alternative standard? That's the other question.

14 I would not want to do a TIC and then have you  
15 all see that as an alternate standard, and then we  
16 didn't go through the alternate standard procedure.

17 So I'm sorry. I get down into the weeds with  
18 this stuff, and I have all of these kinds of questions.

19 MR. SHEPHARD: That's good.

20 But as long as the TICS meet the minimums in  
21 543, then they wouldn't be an alternative standard.

22 CHAIRWOMAN STEVENS: But this is really helpful  
23 and welcome comments. We do get them while we were  
24 here, when we were at NTGRC, when it was AT9. And  
25 those inform and actually help us revise our training

1 so that we can capture some of those questions as we go  
2 out on the road.

3 We also hear them from our regional directors,  
4 certainly because they're the ones on the ground that  
5 are talking to Tribes on a daily basis.

6 MR. OSBORNE: My name is Marvin Osborne.  
7 I'm with the Shoshone Band Gaming Commission,  
8 Fort Hall, Idaho.

9 We were looking at the Class II issue, but  
10 we're really a Class III facility. So we tried out a  
11 couple of the -- well, a few games on the Class II.

12 Then when you look at the regulations, it talks  
13 about having another set of financial books and things  
14 of that nature. I don't know if there's a minimum  
15 amount of machines you can have to trigger off a new  
16 set of financial books to create this compliance with  
17 NIGC's proposed rigs.

18 And we also look at the Colorado case. I don't  
19 know if that's ever been resolved or what. But when  
20 you start shoving things down in a proposed ruling and  
21 you have this law sticking out there, it kind of make  
22 us uncomfortable as to whether or not we're doing the  
23 right thing or if there's going to be changes and we  
24 don't quite figure out what's needed.

25 So I guess those are a couple items that we're

1 kind of wondering about.

2 And the fees -- we just made three comments,  
3 basically, and we sent them out. The fees on the  
4 worksheet. I guess it's not clear. We do an annual  
5 payment. We reconcile the orders. But when you get  
6 down to the end, we don't know whether we have a credit  
7 or a noncredit because it really doesn't say that. We  
8 were kind of looking at that from our financial side.

9 And then the background situation, it looks to  
10 me like NIGC wants to intervene prior to the Gaming  
11 Commission's background review of potential licensees.  
12 We noticed that in that last publication, and we're not  
13 clear on that, what that's supposed to mean or what it  
14 represents. But it just kind of threw a red flag, and  
15 we shot a comment about that.

16 MR. SHEPHARD: On the fees issue, we're still  
17 working on putting together some additional guidance on  
18 that.

19 I think that was a big change, and it's  
20 complicated now that we've gone to quarter payments.  
21 But we are working on guidance. There's guidance up on  
22 the website now. There's some explanation of the fees  
23 worksheet. And I think if you want to give us a call,  
24 if you have a specific question about your fees, we'd  
25 be happy to work through that.

1           On the background fee, I think the biggest  
2 change -- and I don't know that it's really a change  
3 when you look at EGRO. But the biggest change in the  
4 regs is that we're now clearly requiring two notices to  
5 come to the Commission.

6           The first is the notice of results of the  
7 background investigation, and that comes separately  
8 from the notice that you later send to the Commission  
9 saying whether or not you've granted a gaming license  
10 to the employee.

11           The notice of results is important for us to  
12 get early so that we have an opportunity to provide  
13 what we have to do under EGRO, which is to object or  
14 not object to the licensure of the employee in a way  
15 that doesn't create a replication of license problem  
16 for people.

17           MR. OSBORNE: Is that before the applicant  
18 goes to the Commission or is it during the 60-day  
19 process?

20           MR. SHEPHARD: It's during. It's not designed  
21 to add time onto your licensing process. It's designed  
22 to happen at the same time.

23           CHAIRWOMAN STEVENS: Thank you for your  
24 comments, and I believe that we've received your  
25 information.

1 Yes?

2 MR. CHISSOE: Chairwoman, I wanted to backtrack  
3 to the kiosk standards. Looking from my notes, I did  
4 have a question.

5 Speaking about the requirement for three agents  
6 in accessing kiosks, can surveillance satisfy one of  
7 those agent requirements?

8 CHAIRWOMAN STEVENS: I think that's a good  
9 question.

10 MR. SHEPHARD: I believe the proposed rule  
11 requires there be three physical agents, but we have,  
12 as the Chairwoman has said, we've received a number of  
13 comments about that, and you'd like to hear your  
14 thoughts on that.

15 MR. CHISSOE: In developing the standard, was  
16 there a discussion over this? And could you help us  
17 with what the thought process was at arriving at three  
18 physical agents?

19 MS. WALTERS: Well, it was to try to achieve  
20 consistency with our other areas of Drop and Count  
21 and --

22 MR. CHISSOE: The gaming machine section?

23 MS. WALTERS: Yes, in the gaming.

24 However, we have received a number of comments  
25 at our Oklahoma consultation -- which the transcript

1 for that will be up on our website. We haven't  
2 received it back yet from the transcriptionist. But it  
3 will be on our website very shortly so you can see what  
4 some other Tribal leaders and their representatives  
5 have said about that.

6 We've received a number of comments that,  
7 depending on the size of the operation, the time of day  
8 that they do switch those machines out, et cetera, that  
9 it may not make sense.

10 MR. CHISSOE: Right.

11 MS. WALTERS: And those are the type of  
12 comments that we really value and that we'll use when  
13 making a decision about the final rule.

14 Again, since this is just the notice of  
15 proposed rulemaking stage, these comments will go into  
16 the final decision-making process, which we have not  
17 engaged in at all.

18 MR. CHISSOE: Right. Well then, just  
19 face-to-face then, I would like to go ahead and voice  
20 that for consideration then.

21 I think this is an area that someone brought up  
22 earlier. Just for the sake of consistency with other  
23 things, like the gaming machine mix, that might not be  
24 appropriate in this situation.

25 And you have to remember -- and I've written

1 regulation before -- whatever we do in regulation on  
2 paper has to be implemented and paid for by someone,  
3 and I think this is a worthy thing to consider.

4 Thank you.

5 CHAIRWOMAN STEVENS: Are there any other  
6 comments on our discussion today for 543 and 547 or  
7 consultation policy?

8 If not, please we can get this information to  
9 you, or it's also available on our website. We all  
10 have contact information here, if you'd like it.

11 At this time, that will end this consultation.

12 (The meeting concluded at 2:00 p.m.)

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