

1 NATIONAL INDIAN GAMING COMMISSION
2 TRIBAL ADVISORY COMMITTEE MEETING
3 Pala, California
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23 REPORTER'S TRANSCRIPT OF PROCEEDINGS
24 Tuesday, January 10, 2012
25 8:00 A.M.

HELD AT: PALA CASINO SPA RESORT

11154 Highway 76

Pala, California 92059

Reported by:

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PAGES 1 - 208

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Robert Fisher, Moderator

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5 NATIONAL INDIAN GAMING COMMISSION:

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Daniel Little, Associate Commissioner

Michael Hoenig, Senior Attorney

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Michael Curry, Information Technology Auditor

Rod Rest West, CPA

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9 TRIBAL ADVISORY COMMITTEE:

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Executive Director

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Mille Lacs Band of Objive

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Matthew Morgan

Commissioner

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Chickasaw Nation

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Thomas Wilson

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4 Poarch Band of Creek Indians
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6 Pechanga Band of Luiseno Indians
7 Mia Tahdoahnippah
Compliance Director
8 Comanche Nation
9 Brian Callaghan
Executive Director
10 Pokagon Band of Potawatomi Indians
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1 Pala, California, Tuesday, January 10, 2012

2 8:13 a.m. - 5:30 p.m.

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4 STATEMENT BY ROBERT FISHER

5 My name is Robert Fisher. I'm the facilitator
6 for the meeting. In a moment I've got some logistical
7 things and we'll lay out our plan for the day, but
8 before we do that, I'd like to turn it over to
9 Commissioner Little.

10
11 STATEMENT BY DANIEL LITTLE

12 Good morning, everyone. I just want to welcome
13 everybody to our TAC meeting. I think it's only
14 appropriate, while we have the opportunity, I want to
15 welcome Chairman Smith to say some remarks and welcome
16 us.

17
18 STATEMENT BY CHAIRMAN SMITH

19 MR. SMITH: On behalf of the tribe, I'd like to
20 welcome you to the Pala Casino Resort and Spa. I hope
21 you have a productive meeting. I know you guys have got
22 a hard job, with MICS and other issues, so again welcome
23 and enjoy your accommodations and have a fruitful
24 meeting. Thank you.

25 DANIEL LITTLE: Appreciate it, thank you.

1 ROBERT FISHER: Okay. Did you want to say
2 anything else before we get launched?

3 DANIEL LITTLE: I just want to welcome
4 everybody again today. We've got a lot of work to do on
5 this agenda. I know there's some questions regarding
6 kind of the change in the meeting schedule that we've
7 got. I think we can talk about that in a little bit.
8 I'm not sure if Robert wants to do that now or if we
9 want to --

10 ROBERT FISHER: Well, we know it's, you know,
11 on some people's minds, people have mentioned some
12 things to me, and so we're going to need to talk about
13 it.

14 Just as a reminder, before we go there, for
15 anybody who is in the audience with us, please do the
16 sign-in out there so I don't have to say that again.

17 And so, Dan, maybe we should just talk a little
18 bit about that right now and then we'll come back and
19 figure out what that means for our agenda.

20 DANIEL LITTLE: Thanks, Robert.

21 After the last meeting we got the schedule
22 pretty quickly, the agenda pretty quickly and the action
23 items pretty quickly. And the idea was that are we
24 going to have enough work to take us out for three
25 additional meetings, and as I discussed it with the

1 other commissioners and with our staff, we came to the
2 realization that we actually think we can get our work
3 accomplished on time and a lot quicker.

4 And we're doing a lot of things at the
5 commission right now. As a lot of you know, you might
6 have heard in the news, we're in the midst of -- we
7 reorganized the agency. We're doing a lot of internal
8 agency things as far as IT upgrades. We've got to move
9 the agency. We've got a new division, new reporting
10 structure. We've got new staffing positions to hire.
11 We're moving folks around. So there's a lot of stuff
12 going on at the agency.

13 We've also got a lot of proposed rules out
14 there; we published three more on the 27th of December.
15 We've got consultation coming up, so there's -- and then
16 the other big major mechanism is we're revamping our
17 entire training and technical assistance program. We're
18 reorganizing our training catalog and we're looking to
19 make sure that our training matches the needs of the
20 industry. So there's a lot going on.

21 And then I guess the major thing we're looking
22 at is we've got -- we've entered into an election year
23 now and we've got elections coming up in the fall, and
24 what that -- while it won't directly affect the
25 commission, it does affect how we promulgate rules and

1 time frames and how we can do them.

2 So the idea is that if we're going to be able
3 to move through our agenda quickly, if we're going to be
4 able to discuss the topics that we need to, we prepared
5 all the comparison documents; we sent them all out to
6 you. If we can get these, you know, subjects covered,
7 we may be able to finish our work not necessarily at
8 in-person meetings, but through conference calls and
9 through e-mail. This is not unheard of for the
10 commission. Previous TACs had limited in-person
11 meetings. They did a lot of their meetings through
12 smaller working groups, through teleconference and
13 things like that. We're very confident that we can
14 complete the work that we've got left in that time
15 frame.

16 We have all of our staff here. We have a new
17 staff member -- well, not new to the commission but new
18 to the committee, Michael Curry, who is our -- he is
19 right here. He's our IT auditor and he will be very
20 helpful when we discuss surveillance and some of the IT
21 areas. So we're very confident that we can get our work
22 done this week.

23 And then this does not mean this is the end of
24 the TAC. This means it's just the conclusion of the
25 in-person meetings. We will still continue to meet. I

1 know smaller groups have been meeting throughout the TAC
2 process here, and we will continue our work. We're
3 hoping that we can get the Part 547 recommendations to
4 us very soon so we can start working on putting the
5 regulation together for that and get that out.

6 Hopefully that will be out within the next few months if
7 we can get the recommendations here pretty soon. I
8 think we're on track to do so.

9 So that is the reasoning behind shortening the
10 in-person meeting. It does not mean it's the end of the
11 TAC. It does not mean that we're asking you to stop,
12 you know, being involved in the process. It's just we
13 don't feel that we need to have these in-person meetings
14 because we'll have covered all of the major subject
15 areas for Part 543.

16 Does anyone have any question or comments?

17 THOMAS WILSON: Dan, it certainly caught me
18 off-guard as part of the announcement in December. I
19 was just curious why that decision wouldn't be made in
20 concert with the TAC to discuss -- I wasn't sure why
21 that couldn't have been discussed here in this meeting,
22 here's what we're planning, we think we can get through
23 it.

24 I feel really pressured right now to get
25 through a whole bunch of stuff this week. I'm not

1 opposed to doing that, but I feel like if we take any
2 time now at all away from the agenda or to discuss
3 anything beyond just a quick overview, that we're not
4 going to have enough time, and so it caught me
5 off-guard.

6 We were all expected to make a significant
7 financial commitment, time commitment, which we did. So
8 the rationale given in the letter really dealt more with
9 not what you're saying is going on at the NIGC, but
10 about cost savings and the Obama administration and
11 things. And since we're all funding ourselves and we
12 fund your agency, that all seems odd. So it's getting
13 kind of a mixed message from what the letter said versus
14 what you're saying here.

15 DANIEL LITTLE: There certainly is cost-savings
16 issues, and there was that executive order from the
17 president about cost savings. We've heard pretty
18 clearly from this group a number of times that, you
19 know, this is a time commitment, that a lot of you have
20 had to take away from other areas of your facilities.

21 We've got two members that are not here right
22 now because of, you know, requirements back at home. I
23 think Leo will be here tomorrow and I think one other
24 has to leave early. So there is a drain on the
25 resources -- the human resources here. It is very

1 important. I mean, that is one of the reasons why, for
2 cost savings; however, I think we're confused. This is
3 just the conclusion of the in-person meetings. It does
4 not mean we're concluding the TAC. We will still
5 continue our work. It's just going over these
6 individual subject issues, that can be done in person
7 or, if we don't finalize them, they can be done over
8 e-mail.

9 We put together all the comparison documents.
10 We've put together questions, specific questions that
11 we'd like to, you know, hear folks' response on, and
12 then the rest of it can be done over e-mail.
13 Historically, it's not out of the ordinary for TAC; it
14 has been done. So I don't think there's any confusing
15 messages here. We want to make sure we're being
16 respectful of everyone's time and everyone's resources.
17 But also keep in mind that we have a lot of other things
18 going on at the commission. We want to make sure that
19 we get everything done within a short period of time.

20 So it wasn't meant to catch you off-guard. I
21 just think that at the end of the last meeting when we
22 finished early because we ran out of agenda items, that
23 in looking at what we had on the agenda, I don't think
24 it's going to be something that's going to take a lot of
25 time. I mean, I think we've got about three or four

1 major subject areas and the rest will move pretty
2 quickly.

3 ROBERT FISHER: Daniel.

4 DANIEL MCGHEE: Maybe it's something we should
5 reserve some of this discussion for the last day. Let's
6 see how far we get with this meeting and then we'll know
7 how much is left to discuss, whether that's something
8 that TAC feels they can do a conference call or not.
9 They can make another suggestion to the NIGC to consider
10 another meeting or whatever. But it's hard to tell
11 until we know exactly what we can accomplish these three
12 days, so maybe it's something we should reserve to have
13 discussion about the last day, see how far we got.

14 ROBERT FISHER: Robin.

15 ROBIN LASH: I agree with Dan. I think it's a
16 little premature to say upfront when we're going to
17 finish. I mean, we're here with even these stacks of
18 material that we were asked to prepare for for this
19 meeting, and I think that, in addition to that, there's
20 also a final reading just to make sure that the document
21 meshes well.

22 And, personally, I really don't feel that
23 conference calls are going to be productive. I mean, I
24 can't see someone. I'm not directly communicating.
25 You've got 15 people on a conference call all trying to

1 understand and communicate without probably a formal
2 record, and I'm just concerned about that.

3 And I'm more concerned about the fact that this
4 is -- we were told this is our TAC with NIGC being the
5 host, and I think we all agreed to the schedule. We
6 were told there were going to be six meetings. We all
7 felt that more than likely we wouldn't need to cancel
8 this meeting, but I think it was an understanding at the
9 last meeting that Arizona probably would be needed just
10 to make sure that there were no loose ends. I feel like
11 in-person meetings are necessary, and I think it's a
12 little premature to decide at the beginning of this
13 meeting that this is our last meeting.

14 ROBERT FISHER: Kathi.

15 KATHI HAMEL: First off, I appreciate the
16 schedule that NIGC put forth to us, and I think all of
17 us are committed to the six months that it would take.
18 But I have to say that our tribe is very concerned that
19 the NIGC has canceled these meetings without the input
20 from TAC committee. I can see that there's still a lot
21 of work to be done.

22 I've spent since 2007 on and off working with
23 the TGWG, and the face-to-face meetings produced far
24 more products than telephone conferences. Those of us
25 that have been on our little conferences, it's

1 difficult. You know, you're at your office, you get
2 pulled away and, you know, it's not very productive of a
3 process. I can't imagine -- Daniel, you remember those
4 calls with many people.

5 DANIEL MCGHEE: I remember I would cut them
6 off. It's hard because you decide to work on something
7 else while you're listening to the conversation.

8 KATHI HAMEL: Well, and our operations reach
9 out to us. They know we're in our office. I also feel
10 that the process is being rushed, and I guess I don't
11 understand why. The material that we received this
12 last, you know, week or so is huge. I can speak that
13 I've not gotten through all those documents and have
14 been fast and furious trying to come up with answers to
15 the questions by the NIGC. But I just think that there
16 just needs to be more meetings to successfully complete
17 this process.

18 ROBERT FISHER: John.

19 JOHN MAGEE: I have to echo what's been said so
20 far. My concern, you know, is the same, caught
21 off-guard with the letter from NIGC saying this will be
22 the last meeting. You know, from our standpoint NIGC
23 sends a letter saying whoever you choose to somehow put
24 on this TAC, make sure you're committed to the duration
25 of the process. And so going upfront, we all knew that

1 schedule. We knew it was six months out, so we planned
2 accordingly. Any time that you see these materials,
3 it's a lot. There's a lot to cover here.

4 And no disrespect, Dan, if you think you can
5 rush this somehow, you'll see it's not that quick. I'm
6 trying to echo what Tom said. I feel like I'm rushed
7 here. And I think we have an obligation to support the
8 quality product, a product that we're all comfortable
9 with. But in the end -- I'm trying to pick up what
10 Robin said -- we need time to review this, to make sure
11 that we're committed to TAC, that we're all comfortable
12 with it.

13 To me, I would have kept the schedule. At
14 least Phoenix is necessary. But, Dan, it's a little
15 premature to determine what our schedule is going to be
16 going forward because we have not have gotten through
17 this part. But so far, you know, I am a little bit
18 disappointed with NIGC with the letters.

19 ROBERT FISHER: Anybody else?

20 BRIAN CALLAGHAN: I just would like to say I
21 agree with what's been put forth by the TAC. I'm
22 disappointed that we're going to end this by telephone
23 allegedly, or at least that's what's being suggested. I
24 saw shortly after you made your announcement about
25 cutting back on travel that you announced that you were

1 going to be going to Florida and then back out here in
2 January. So one questions the concept of cutting back
3 on costs. Maybe you can add a consultation to Phoenix
4 next month and you can get some economies off that, but
5 I respectfully suggest that we have one more meeting in
6 Phoenix at least.

7 DANIEL LITTLE: I definitely understand
8 everybody's concerns, but, I mean, the consultation that
9 we're doing in Florida and in California are what we're
10 required to do because we've got proposed rules out
11 there and we do need to have a consultation during the
12 comment period. So those are required. They're a
13 half-day event. The entire commission is not attending
14 and limited staff will be there. So it's a very short
15 event with very minimal costs, and those things are
16 separate from the work of this organization or this
17 group here.

18 However, it's not unheard of in the past for
19 this commission to do Tribal Advisory Committee meetings
20 through teleconferences. And this is not the conclusion
21 of the TAC, it's just a conclusion of the in-person
22 meetings to discuss the specific sections of the Tribal
23 Gaming Working Group proposal. It doesn't mean that the
24 smaller groups that have been working on finalizing the
25 recommendations to the commission will stop. That will

1 continue. It's just the, you know, meeting to go over
2 the specific sections will be concluded. And the
3 commission does not feel that it's a viable use of
4 everyone's time or resources, and it will give us the
5 opportunity to be able to start working on a regulation
6 sooner than if we had to wait until March or April or
7 later.

8 MATTHEW MORGAN: I agree with what everyone's
9 said here so far from the TAC. It caught me very
10 off-guard with the letter. My question after reviewing
11 all this material comes, you know -- or I guess my
12 statement would be, reading through the questions and
13 the comments that the agency sends back to us, it's
14 readily apparent that you have taken this in a
15 piecemeal-type fashion.

16 There are questions of why was this deleted. A
17 lot of times throughout this process we will tell you
18 it's not been deleted, it's been moved to this page.
19 What happens at that point if, you know, at that point
20 you realize something's been moved and not deleted or
21 something's been changed or modified? Now you're asking
22 us to go back and read it. What happens then when they
23 have more questions and more questions and more
24 questions?

25 Because I'm not quite for sure that we, even as

1 a group, have a sense of what the entirety of the
2 document is going to look like at the end. I think
3 that's one of the reasons that people want a final
4 option to come in, review what's said on a path of
5 discussion, because it's very apparent -- in my mind
6 there's a reason that your consultations that you speak
7 of take place in person. I mean, that is the best forum
8 for exchanging ideas. Conference calls are nice,
9 videoconferencing is nice, but in person still is the
10 best medium for exchanging ideas and having a discussion
11 over subjects, and you can watch that discussion in the
12 room so far ebb and flow and move and how does
13 California see it as opposed to, you know, Michigan or
14 Alabama or Oklahoma.

15 You're going to lose that depth and richness of
16 the conversation once you move it over. It's not
17 unheard of that TAC has participated in conference
18 calls. I agree. But at least to my knowledge almost
19 every TAC has followed up at an in-person meeting.
20 We've always, you know, looked at this as a process.

21 We knew these schedules were going to be
22 aggressive when you put out the notice. You know, six
23 months is a very quick time frame to get this in. I
24 think you can see by the amount of materials that came
25 up this time just how much there is still to review.

1 And I think from what I hear talking with individuals is
2 our most important part of this is we want to get it
3 right. Our names are attached to this document just as
4 well as yours are. We want to make sure that it's
5 right, and I would agree that they think, you know -- or
6 at least we're thinking that it may be premature at this
7 time.

8 Your response, it sounds like that is not up
9 for discussion, that it has been decided and that
10 discussion is not on the table to have, which is
11 disappointing if that is the case, because, you know, I
12 think the group is committed to finishing this process
13 and having a good workable product for Indian Country
14 when they're done.

15 ROBERT FISHER: Okay. So Robin's got a card
16 up. Let's take Robin's comments and see if you have
17 anything more you want to say, and then I think maybe we
18 should put it aside for now, if that's okay with
19 everybody, and get into our agenda for the day and
20 figure out when we can come back to this.

21 ROBIN LASH: I had a couple of comments. My
22 first, though, would follow on the heels of what Matt
23 just asked. Is this open for discussion, Dan, or is
24 this what we're being told and that's it?

25 DANIEL LITTLE: This is what the Commission

1 decided and, yes, this is the last meeting, this is the
2 last in-person meeting.

3 ROBIN LASH: That NIGC will be --

4 DANIEL LITTLE: Yes. I know that Tribal Gaming
5 Working Group has been having conference calls
6 throughout this process, so, I mean, there have been
7 other meetings going on to discuss these issues.

8 ROBIN LASH: And that is on the heels of the
9 main work we did. We met face to face to do our primary
10 work.

11 DANIEL LITTLE: I know, but a lot of these --
12 excuse me, I'm sorry. A lot of these folks were
13 included in those meetings because we got calls from
14 folks saying why am I being included on this list, I
15 never requested to be included in this group, but they
16 are, so the TAC members were included in those Tribal
17 Gaming Working Group meetings.

18 ROBIN LASH: So if this process is supposed to
19 take place in a public meeting format, which was
20 established at the first meeting, how are we going to
21 complete our work in a public meeting format?

22 DANIEL LITTLE: I'm not quite clear about
23 "public meeting format."

24 ROBIN LASH: Well, that's why we're here, it's
25 the public meeting where others can participate and

1 follow along with our work. How will that happen if
2 we're supposed to conclude by conference call?

3 DANIEL LITTLE: That doesn't mean that there
4 hasn't been times when nonpublic aspects of the TAC have
5 taken place. We've been in executive sessions a number
6 of times where the public wasn't included, so I don't
7 understand. I mean, we'll have a conference call and,
8 you know, folks will free feel to call in. I'm not sure
9 how we'll set it up yet, but --

10 ROBIN LASH: All of our decision-making process
11 took place in a public meeting format. I mean, we may
12 have had a comment or we may have had discussions in an
13 executive session --

14 DANIEL LITTLE: I wouldn't agree with that.

15 ROBERT FISHER: Dan, can you just let her
16 finish.

17 DANIEL LITTLE: I'm sorry.

18 ROBIN LASH: Anyway, we would come back and
19 then in front of everybody we would review what we
20 discussed, and the final discussion and decisions were
21 made for the record.

22 DANIEL LITTLE: I'm not necessarily sure if I
23 would agree with that, because there were some things
24 that were discussed in executive sessions and then came
25 back and we were given 'this is what we decided upon'

1 and we didn't get much of a reason why. That's when we
2 went back and had to ask for some followup and was
3 provided that, but there was some decision made.

4 And finishing the work of this group through a
5 teleconference or videoconference is not meant to try to
6 limit the inclusion of the public. That's not the goal.
7 The goal is to get the work done in a quicker fashion
8 with, you know, being cognizant of everybody's time and
9 saving resources.

10 ROBIN LASH: With all due respect, I think
11 we're more concerned about a good product, and we're all
12 willing to commit our time to ensuring that the document
13 that we're working on is a document that is good for
14 Indian Country. And I think for myself and maybe others
15 that this rushing, this is not the way to do it. I
16 really try to feel -- and I really don't think that
17 starting out this meeting telling us this is the last
18 meeting is productive for the product we're working on.

19 ROBERT FISHER: Okay. Anybody have anything
20 else on this? Are we ready to move into our work for
21 the day and then we can return to this if we need to
22 later on in our meeting?

23 Okay. So if we're going to move on, the agenda
24 that we sent out before Christmas was designed to get us
25 through completion of all of the open MICS sections and

1 to do additional work on the Part 547 and complete some
2 of the work around our working documents. We sent out a
3 big raft of documents, a couple of big piles of
4 documents over the last couple of weeks, the draft
5 meeting summaries and the comparison documents.

6 Over the holiday time, Christinia and Jeff
7 worked on guidance and best practices documents. Those
8 got sent out last week. Kathi and Tom worked on sample
9 checklists.

10 Leo, by the way, sent a message saying that he
11 got tied up today and was not going to be able to join
12 us today and he'll be here Wednesday and Thursday, and
13 you also may remember that Carleen isn't joining us for
14 this meeting at all.

15 So I know there have been some problems in the
16 past about people getting documents. Does everybody
17 have all the documents? Anybody have any problems with
18 the documents? Okay.

19 MICHELE STACONA: The ones you just sent?

20 ROBERT FISHER: Any of them, I mean, over the
21 course of the last couple weeks. This morning I sent
22 the December meeting summary this morning that had the
23 compiled MICS document to date so that if you needed to
24 refer to it while we were in here, you would have that
25 in front of you.

1 So, I mean, I was not assuming that we were
2 going to actually be working from that document, but it
3 is a record for everybody to be referring to as we go
4 through the next couple of days and, in part, the format
5 for how things have been set up.

6 So there was a question that arose around one
7 of the comparison documents. We clarified that in a
8 message that went out last week.

9 ROBERT FISHER: Kathi.

10 KATHI HAMEL: Do we know why in the comparison
11 documents, the redlined on the TGWG?

12 ROBERT FISHER: I don't. There was a question
13 about one of the comparison documents and NIGC clarified
14 that, so maybe you should pose the question to them and
15 let's see.

16 DANIEL LITTLE: What was that again?

17 KATHI HAMEL: The comparison document that we
18 received, the side by side against the July 2010
19 proposed -- is the TGWG submitted in July, the TGWG has
20 all this redline in it, and I personally thought it was
21 very confusing in reading it. I don't know what the
22 redlines of the TGWG.

23 In South Dakota we reviewed the final product
24 as our comparison, and I know the NIGC went out and made
25 copies of the final document. But if you look at 542.16

1 as an example what the TGWG submitted through Poarch
2 Creek --

3 DANIEL LITTLE: We have always been using the
4 redlined. We've always been using the redlined. I'm
5 just going back to ones we did earlier. We've always
6 been using the redlined.

7 ROBERT FISHER: So the question that you're
8 really asking is were they working from the latest
9 version that the TGWG submitted; right? And so the
10 answer is yes -- they're nodding their head yes over
11 here -- even though it's showing up in the redline and
12 we're not exactly sure what it's redlining to.

13 MICHAEL HOENIG: Can I address that?

14 ROBERT FISHER: Sure, go ahead, Mike.

15 MICHAEL HOENIG: The purpose of the side by
16 side in the columns is to show the changes that were
17 made from the original -- or the draft 2010 regs or
18 whatever, so the redlines will be crossing out the
19 sections. But, I mean, all we did was change the main
20 document and Appendix 1 of the Poarch Creek and kind of
21 show how that changes. Instead of just putting it, you
22 know, blank or the as-is side by side, it's now
23 showing -- we want it to show what's been taken out,
24 what's been added from the draft 2010 regs. So that's
25 the purpose of the side by side. That's how we've

1 always been doing it.

2 KATHI HAMEL: Well, what's been redlined in the
3 TGWG side has pull tabs --

4 MICHAEL HOENIG: Yes, and we fixed that and
5 that's because the Appendix 1 made changes to 543.8, .9
6 and .14. They pulled stuff in from all of them, and we
7 just -- unfortunately it was just a drafting error. We
8 missed certain parts of that, but it did originally have
9 language from pull tabs, language from bingo and
10 language from .14 all pulled into one section in the
11 TGWG. So what I did on the one that we sent out -- the
12 last one we sent out fixing it, was try to get all the
13 stuff about card games, all the stuff about pull tabs.
14 Now you just make it down to that .14, that was the main
15 thrust of the --

16 ROBERT FISHER: Okay. So the other thing is,
17 right before we get started, at the end of the last
18 meeting, and you'll see on the action item list on the
19 December summary, there was a suggestion that we be able
20 to revisit the -- let me use the mike.

21 Okay. The request from our transcriptionist is
22 that everybody use the mikes, please.

23 Okay. So at the end of the last meeting there
24 was the suggestion that was made that we revisit and
25 keep in mind the principles that we generated -- that

1 list of principles we generated at the inaugural meeting
2 in Connecticut.

3 And you may remember they're captured in the
4 October meeting summary, and because we don't have any
5 flip charts, and you can't really see them from the back
6 of the room anyway, what I did to be responsive to that
7 request and to make sure people had the information was
8 to just extract the list of principles out of the
9 October summary and put it on this piece of paper that I
10 can then distribute around for the TAC members. There
11 are some extra copies for people in the audience, if we
12 get there, and this is just, by way of reference, the
13 list of principles that we generated in Connecticut. It
14 does not reflect consensus. It's really just a way to
15 look at the work we're doing and what's important to
16 people.

17 Give me one second to get the document up here.
18 And our agenda where we set up to start, we have three
19 sections on the agenda to cover today, assuming that we
20 can get through them, or more if we get through these
21 faster than we anticipated. Just bear with me one
22 moment.

23 The other thing, while I'm waiting for my
24 computer, just again a reminder for people in the
25 audience, if you'd please sign in on the sign-in sheet

1 out there. And we do have time on our agenda for public
2 comment if people in the audience want to speak directly
3 to the committee, and there is a sheet outside on a
4 table right outside that door. There's a place there to
5 sign up for public comment if you'd also like to do
6 that, and we have two sessions for public comment on the
7 agenda, one right before we break for lunch and then one
8 later on this afternoon.

9 Just so you know, what I'm going to work from
10 today up on this screen, is I'm working from the
11 document that I sent out this morning. So if you need
12 to refer back to anything that we've done previously,
13 recognizing that people haven't had a chance to review
14 it or pass on it to make sure it's captured correctly,
15 this is the version of the document that was sent out
16 this morning.

17 Because I have multiple documents where we have
18 been working and I'm trying to now work from a single
19 document, and this thing that I sent out this morning
20 captures everything that we did at the November meeting
21 and the December meeting too, recognizing that it hasn't
22 been reviewed yet and it's still subject to
23 clarification.

24 MATTHEW MORGAN: What's the document title? I
25 don't see that, but there's three.

1 ROBERT FISHER: It's the document that is the
2 draft proposed MICS dated 01/09/12. It's not the one
3 that's marked because that's marked through a TGWG
4 document.

5 ROBIN LASH: Could you enlarge that, please?

6 ROBERT FISHER: Yes, I'm going to as soon as I
7 remember how to do it. What I want to do is actually
8 enlarge the type, which is what we ended up needing to
9 do at the -- who remembers how to do that?

10 Okay. Are you with me? When I was working,
11 remember we had an informal drafting group that helped
12 me set up the structure for the November meeting
13 summary, and the work that came out of November, and one
14 of the suggestions they made, was to make sure we had a
15 compilation of what we have been working on and when we
16 have worked on it, and so both the December meeting
17 summary and the MICS document contains this list of
18 where we've worked on things. That's what this funny
19 little thing in the front is. It's the same index
20 essentially. I guess you can have an index at the
21 beginning of the document. It's the same index as
22 what's in the -- without this extra column here on the
23 right that shows the meeting where we talked about
24 various things.

25 Okay. So everybody clear with where we are and

1 what we're doing? Okay. What's first on our agenda is
2 543.16.

3 MIA TAHDOOAHNIPPAH: May I make a motion for
4 the TAC to go in an executive session? Our advisor has
5 advised us that he would just like the TAC to discuss
6 amongst ourselves some things so it's not just kind of
7 moving forward -- everything isn't just kind of moved
8 around us, and I think we'd just kind of like to get
9 organized and all be on the same page.

10 ROBERT FISHER: Robin, were you going to say
11 something?

12 ROBIN LASH: I agree. I mean, right now we're
13 trying to move forward, or at least that's the process
14 from your end of the table, but everybody is really
15 scattered right now. We've got mountains of documents.
16 We're trying to figure out where we are and what we're
17 doing.

18 MIA TAHDOOAHNIPPAH: Also, it's been brought up
19 that maybe we should go back to 547 since we're almost
20 done and try to get it finished and get all of those
21 things done and get that to you final so you can push
22 that forward and we all accomplish something quickly.

23 ROBERT FISHER: That is on our agenda over the
24 next three days, so --

25 DANIEL MCGHEE: So you're saying, Mia --

1 MIA TAHDOOAHNIPPAH: Possibly. I think we
2 should just talk and discuss amongst ourselves moving
3 forward just so we're all on the same page.

4 ROBIN LASH: I think it might be productive if
5 we can have a moment to get on the same page, but
6 secondly, I would also strongly recommend that if we're
7 going to start anywhere, we should start with 547
8 because we have met on it and I think our TAC and NIGC
9 work together very well on it. I think that all
10 questions were probably answered already, and I think,
11 you know, because of the timing that you've mentioned
12 that document may be ready to move forward right away.
13 So I think we've never established our formal submittal
14 process for 547, and I think we would need to outline
15 that because I think the TAC is ready to move forward
16 with a formal submittal so that NIGC can then move
17 forward for comments on 547.

18 MIA TAHDOOAHNIPPAH: Do we need a vote?

19 ROBERT FISHER: Well, did you want to involve
20 NIGC in that discussion, Mia, or not?

21 DANIEL MCGHEE: The executive session?

22 ROBERT FISHER: Right. Okay. So why don't we
23 take a break and let people caucus and so that way we
24 don't have to get into the discussion about whether the
25 NIGC is included in the executive session or not

1 included. Let's just break and allow people to caucus,
2 talk to whomever you want, and we'll start up again in
3 15 minutes. If that's not enough time, we'll extend the
4 break. Does that work?

5 DANIEL MCGHEE: I just want to understand
6 before we break, just so I make sure I see all sides of
7 it, I know when we had the discussion of the executive
8 session at one time, was it consensus that we were going
9 to let at least one representative from NIGC be part of
10 the executive session? I mean, I thought we had this
11 argument once already. I mean, it doesn't bother me,
12 but I think this was brought up once so that they don't
13 feel -- at least I think it was discussed at least one
14 representative would be involved in the executive
15 session, and that's just to be fair and that's what we
16 discussed.

17 ROBERT FISHER: Correct, we did discuss that.

18 DANIEL MCGHEE: I mean, that could be part of
19 your caucus but that's --

20 ROBERT FISHER: The operating procedures allow
21 for the group to break to caucus and to talk to whomever
22 you want. So how about if we move in that direction for
23 right now and then see if we can come together after
24 that and figure out how we're going to move forward.

25 So we're going to take a break, initially

1 15 minutes, start up again at 9:15 unless the group
2 needs more time.

3 (Caucus break.)

4 ROBERT FISHER: So a couple of quick
5 preliminary things. The request is use the mikes
6 because there are some folks who are having trouble
7 hearing and our transcriptionist is also having a little
8 trouble hearing some folks.

9 So thanks to everybody in the audience for your
10 patience. This took longer obviously than we predicted
11 or that we expressed to you and I have no idea what
12 happened. So who is going to speak about where we are
13 and what we do next?

14 Tom.

15 THOMAS WILSON: We'd like to thank everybody
16 for indulging us. Our rules allow us to go into caucus,
17 which we did as a TAC. We appreciate the audience,
18 everyone bearing with us. The microphone is not staying
19 on. Anyhow, we appreciate everybody bearing with us.
20 We did have some issues that we wanted to discuss in
21 caucus, and I would just like to recap those for the
22 record.

23 We do feel that we need to get 547 done and
24 submitted to NIGC. And, Robert, in that regard we
25 aren't sure where you're at in that final document. I

1 know we had talked about the format and I think we
2 agreed on format already. What we would like to ask, if
3 possible, if that document can be ready this week and
4 come back to the TAC, that we can make a final pass at
5 it and then vote on it for consensus for submission at
6 NIGC.

7 And then our recommendation at NIGC would be to
8 move that document forward just as rapidly as possible
9 to get published since we believe that's a document that
10 everybody has consensus on, including NIGC, from our
11 previous meetings so there's no delay in getting that
12 published.

13 The other thing we discussed, of course, was
14 this being our last face-to-face meeting. The TAC would
15 like to recommend -- and we'll probably vote on this,
16 but that we feel like likely we will still meet in
17 Arizona, in Phoenix, according to the schedule, although
18 the dates may be different.

19 We understand that NIGC will not be
20 participating formally at that meeting, but we would
21 invite you to participate and certainly make available
22 conference calling or whatever means to have any
23 discussion as part of that meeting. We feel that that
24 meeting is important for us to continue on to finish up
25 our work, and the value of face-to-face meetings -- we

1 just like that format, it's working for us, so we'll
2 continue in that regard.

3 Whether we need another face-to-face meeting
4 after February, we'll see, but we are on task that we
5 might not, but that remains to be seen. In any event,
6 we are committed to finishing our work per the terms
7 that we set out in trying to be completed by March with
8 everything.

9 The other thing we discussed was the necessity
10 for NIGC to again understand the entire concept of the
11 Tribal Working Group document, and in that regard we
12 would like to get to a point within NIGC where we can
13 walk through an entire process, so let's say card games,
14 where we can talk about the regulation, the guidance
15 document, the checklist, so that all the pieces kind of
16 fit together, because we've talked about these things in
17 their individual component but we really haven't brought
18 them all together as one entire process, and we think
19 that would be beneficial for the NIGC and our group to
20 see what the entire process cycle would be of a
21 regulation and how one would audit that and how those
22 could be created at the tribal level.

23 So that's something, if we have time this week,
24 we would like to -- perhaps that's on the last day -- as
25 a modification to the agenda. And then finally we are

1 committed to getting through agenda items that we have
2 in front of us. Our focus, however, is going to be on
3 answering questions that NIGC has presented to us in
4 those documents, and to the extent that any of the TAC
5 members have additional questions or concerns about the
6 documents, then, of course, we'll bring those forward as
7 part of this meeting.

8 But our goal is to answer your questions this
9 week and get through those documents timely. So the
10 only thing I would move for the TAC to vote on is, you
11 know, meeting in February, just if we're going to go
12 ahead with the meeting in February, that would be the
13 proposal, I presume just sticking to the same date and
14 times that we already had set aside, so I would call for
15 a consensus vote on that from the TAC.

16 ROBERT FISHER: Okay. So if you're in
17 agreement, raise your hand. That appears to be
18 everybody. And what the NIGC does with respect to that
19 meeting we'll sort out later, I guess; right?

20 THOMAS WILSON: Yes. The other question that
21 came up, Robert, is your availability. We don't know
22 what your role is beyond this meeting, and we had been
23 relying on you as the consolidator of these various
24 things, so that's something that will have to be I guess
25 discussed with the NIGC as to whether your role is

1 continuing in part of that process.

2 ROBERT FISHER: Okay.

3 THOMAS WILSON: For purposes of the group,
4 could you give us an update on 547, if you think that
5 document would at least be ready to be reviewed by us in
6 the format we talked about?

7 ROBERT FISHER: Happy to. I believe it's
8 already ready for you to review it. It was attached to
9 the November summary that was distributed to the group
10 in mid December, so everybody should have it or have
11 access to it.

12 THOMAS WILSON: That being the case, can you
13 modify the agenda that we can talk about that document?
14 I'm guessing probably it's actually the first order of
15 business on Thursday.

16 ROBERT FISHER: Okay. Well, actually it is on
17 the agenda for Thursday, I think like -- I can't
18 remember. We can change the agenda around to be able to
19 do that. And so by all means, you know, if I need to
20 re-send that to anybody or if we need to make sure
21 people have access to it, we can do that.

22 And what I did was I took the TGWG version and
23 made all the changes in that so that there should be a
24 clean version and a redlined version of it.

25 MIA TAHDOOAHNIPPAH: Is that attached to the

1 November summary?

2 ROBERT FISHER: Yes, to the November summary.
3 And there are some things in there. For those of you
4 that can see it in color or who have color copies, it
5 contains two colored things in it. One is a set of
6 notes to NIGC, which are in one color, which, if I
7 remember correctly, is either green or turquoise, and
8 those were part of the TAC's consensus recommendations
9 for changes to the document and direction to NIGC. And
10 then there are changes -- there are notes to the TAC in
11 yellow that we will actually have to sort through when
12 we get to that discussion on Thursday.

13 All right. So then are we proposing to just
14 start on our agenda where we said we were going to
15 start, which is 543.16? And just for my understanding,
16 Tom, I heard you say that what you wanted to focus on
17 were NIGC's questions, and so does that mean you want me
18 to be working up here on the document or are we pretty
19 much in kind of a discussion mode?

20 THOMAS WILSON: Well, I think working on the
21 document. It's no different than what we've been doing,
22 but we just want to make sure that we're answering all
23 of their questions that they have on these documents.

24 ROBERT FISHER: Okay. I wanted to be clear
25 what you wanted me to do. Okay. Give me one second

1 here to get the document back up.

2 JOHN MAGEE: Robert, can you clarify a date on
3 the summary?

4 ROBERT FISHER: Yes. Hold on one second.
5 The draft is dated the 22nd.

6 MATTHEW MORGAN: It's called "Draft November
7 Meeting Summary" is the TAC draft.

8 ROBERT FISHER: And the format of that document
9 I discussed with our little informal drafting group, Tom
10 and Kathi and Daniel.

11 MIA TAHDOOAHNIPPAH: Explain the colors again.

12 ROBERT FISHER: Well, there's two sets of
13 colors in there. One is yellow, I know that, and all
14 the yellow things start off by saying note to TAC. And
15 then it either talks a little bit about what might be
16 added or changed, but it also says here some things we
17 need to deal with. And then there's a separate color,
18 which is either green or light green or turquoise -- if
19 anybody can see it, you can help me out with the
20 colors -- or blue, whatever, light blue. That says note
21 to NIGC, and the notes to NIGC in there were a part of
22 the consensus recommendations that the group reached,
23 assuming that I got everything right.

24 MIA TAHDOOAHNIPPAH: (Inaudible.)

25 ROBERT FISHER: December 23rd. I will send it

1 again on a break to everybody, if you'd like, to make it
2 easy. There are notes to NIGC; they're part of the
3 consensus recommendation.

4 MIA TAHDOOAHNIPPAH: What about the redlines?

5 DANIEL MCGHEE: Those are changes he made to
6 the TGW document.

7 ROBERT FISHER: Correct. That's correct. It's
8 smart to show what the TAC did from the TGWG document.

9 Okay. Is everybody ready to move off 547 and
10 start up with 543.16? Everybody ready to go to 543.16?
11 So just as a time check, by my watch it's about a
12 quarter to 11. On our agenda we set aside a public
13 comment period for at a quarter to 12, so it had been on
14 the agenda for 30 minutes. This time it was on the
15 agenda for 15 minutes, and we've had at least one person
16 who has indicated that they would like to provide public
17 comment to the committee, so we'll need to break no
18 later than a quarter of in order to make sure we have
19 enough time before we break for lunch for public
20 comment. All right.

21 We're still getting organized up here. We're
22 going to work the same way that we worked at the
23 December meeting, start with the comparison documents
24 and identify the places in the comparison document where
25 NIGC raised questions.

1 DANIEL LITTLE: Correct.

2 ROBERT FISHER: Okay. So if I have that
3 correctly, that would be page 13 of the 543.16
4 comparison document. Okay. So our procedure at the
5 December meeting was to get kind of a quick overview of
6 the provision from somebody from the TGWG.

7 Is that thing big enough on the screen? Can
8 people read it or should I make it bigger? Is it okay?

9 So TGWG people who also are on the committee,
10 they could give us an overview of this before we launch
11 into the NIGC's questions. Do you want to spend the
12 time to do that?

13 Would it be useful for you, Dan?

14 DANIEL LITTLE: It might not be a bad
15 refresher, or also for the folks in the audience.

16 ROBERT FISHER: Okay.

17 DANIEL MCGHEE: I can read you -- there's a
18 reference to what they say.

19 ROBERT FISHER: So who is going to do it? Bear
20 with me while I'm pausing here for one second. I'm just
21 trying to get 543.16 up on the screen and insert the
22 standard change that the group agreed to at the November
23 meeting, and that is to do this. Okay. So who from the
24 TGWG is going to give us the overview? Daniel, Matt,
25 Kathi?

1 DANIEL MCGHEE: I don't recall specifically
2 what the process was behind information technology other
3 than (inaudible) so as far as for me to try to -- they
4 put in the reference document as to why they did what
5 they did, so it said, reflect the new name, focus the
6 content on Class II gaming systems. The TGWG found that
7 the MICS previously referring to information technology
8 could cause confusion as to which systems or controls it
9 were applicable to. Proposed changes reflect
10 consolidating similar controls for consistency and to
11 make the controls easier to use and allowing flexibility
12 in a highly (inaudible) gaming operation (inaudible).

13 That's the only explanation, formal
14 explanation, they gave to the change, the TGWG. Now,
15 does somebody specifically remember more details than --
16 I know this section had a lot of different people from
17 technical aspects talking about it. IT people were
18 involved with it. I wasn't specifically involved in
19 this section.

20 ROBERT FISHER: Okay. Anybody have anything
21 else to add or should we move to the NIGC questions?

22 Tom, were you going to say something?

23 THOMAS WILSON: When we get to the questions.

24 DANIEL MCGHEE: I say we move to the questions.

25 ROBERT FISHER: Okay. So over to you, Dan and

1 Mike.

2 DANIEL LITTLE: This is Michael Curry. He's
3 the IT auditor with the Commission. I'll let him
4 introduce himself a little bit, tell us about his
5 background. This is his primary expertise, and he was
6 involved in preparing some of the -- or doing the
7 original review of the document, so Michael Curry.

8 MICHAEL CURRY: Thank you.

9 DANIEL MCGHEE: Did you review the technical
10 standards too?

11 MICHAEL CURRY: Not the level Nimish did, but I
12 did review those. He's involved more in input and I
13 took over the IT, surveillance aspect of it. But,
14 again, more so of a group effort.

15 How's my voice in the back back there? Great.
16 Perfect. Okay. And I appreciate the opportunity to
17 attend this function here this week. Of course, we've
18 been hearing about it through the grapevine.

19 Rest, he's been sharing the information that's
20 been falling out and the results and cooperation from
21 everyone really. So, again, we've been getting it
22 sometimes secondhand, so this will be my first time
23 getting the information firsthand and joining you all as
24 opposed to -- I guess it was maybe a year ago, and
25 previously to that it's been on the MICS advisory

1 committee. So what I can see now this is very, very
2 similar to that, pretty much the same format.

3 But, again, I want to thank everybody for being
4 invited out here today. And regarding the questions on
5 the IT portion and for the surveillance, I just wanted
6 to kick off with -- we're going to hit off on
7 all --(inaudible), correct? Okay. My apologies, I'm a
8 walker. I like to walk around, so if I walk away from
9 my mike, which I'm about to do, forgive me. Just feel
10 free to have me repeat something if you'd like.

11 So does everyone have an electronic copy or a
12 hard copy of what we're about to cover? On page -- it
13 looks like starting on page 13 of 19, and, again, if
14 there's a specific area you want me to key in on,
15 certainly bring that to my attention. If not, I'm going
16 to just pretty much stick to the format as the questions
17 present themselves. So feel free to pretty much arrange
18 it the way that you'd like it addressed.

19 Page 13, Does the change come into conflict
20 with industry standards -- my apologies, the light's a
21 little dim here -- for other U.S. based professionally
22 sanctioned information technology regulatory entities?

23 ROBERT FISHER: Mike, please repeat the
24 question slowly.

25 MICHAEL CURRY: Sure. We're going to move

1 back to the land-based microphone here. Okay.

2 For clarification of the question in blue, Does
3 the change come into conflict with industry standards
4 for other U.S. based professionally sanctioned
5 information technology regulatory entities?

6 Well, from an explanation standpoint, in order
7 to be professionally sanctioned, a control, the control
8 entity and the control objective, it needs to address a
9 specific need or specific variance or specific gap or
10 risk. Again, not to bring up a question I heard
11 earlier, but there were questions or an issue regarding
12 is this even a risk environment? The answer is yes.

13 All these IT controls, surveillance controls,
14 are all risk-based. And what that means is, if you're
15 going to come up with a list or a booklet or a policy
16 and procedure with controls, which controls are you
17 going to put in there? I mean, there's millions of
18 controls within the industry. You only want the ones
19 that apply to your particular environment. If not,
20 you're going to have a plethora of controls that you're
21 required to comply with and they don't even pertain to
22 your own specific environment.

23 So we in the NIGC, at least from what an
24 ultimate goal perspective is, is what applies to your
25 specific environment? I mean, what is it that you need

1 to have into effect 24 hours a day around the clock to
2 protect your assets and protect your environment? So
3 risk-based, yes. If it doesn't present a risk to your
4 environment, then what's the point? What's the point of
5 spending time, money, resources, everything you can
6 throw at it if it's not answering a question?

7 It has to answer a question, and that question
8 is what could happen to us if we don't implement this
9 control or if this control is weak? What could possibly
10 happen to us? That's where the risk comes from. So if
11 you can't answer that question, my professional opinion
12 is get rid of the control because there's other areas
13 you can apply those resources to.

14 Going back to the question being asked here,
15 does the change come into conflict? Well, any time you
16 have a -- and I'm going to use IT again for an example
17 since that's what we're working on now. Any time
18 there's a sanctioned regulatory body, which it is in
19 this country, there's going to be a list of control
20 objectives that are common to all IT environments across
21 the country, literally across the world, but we're only
22 going to speak to across the country, that are going to
23 be common to all those environments that should be in
24 place. It doesn't matter if it's a gaming operation in
25 California or New York or Florida or Alabama; it doesn't

1 matter. More than likely 99.99 percent of that control
2 is going to apply to your particular environment. If it
3 doesn't apply to your environment, then get rid of it.

4 So in answer to the question, does it conflict
5 with the changes, yes, it does conflict with the changes
6 if you throw out all those risk-mitigating control
7 objectives that were put there in the first place to
8 minimize your risk, not even to get rid of your risk in
9 your environment completely, that's impossible. If you
10 IT there, there's going to be some kind of risk.

11 ROBERT FISHER: Okay. It looks like Tom wants
12 to comment. So go ahead, Tom, and then Matt.

13 THOMAS WILSON: I can comment a little bit on
14 this. The first question I have, though, when you're
15 talking about your -- it stopped again.

16 ROBERT FISHER: I'll get the guy to fix it.
17 Just press ahead. Matt, you're next.

18 THOMAS WILSON: I presume you're talking about
19 the ISACA standards or --

20 MICHAEL CURRY: ISACA, COSO, there's probably
21 maybe three to four common ones that the industry has
22 elected to get, this is what we're going to use.

23 THOMAS WILSON: In that regard, I don't know if
24 you had an opportunity to review the guidance document
25 that supplements --

1 MICHAEL CURRY: Yes, I have.

2 THOMAS WILSON: So in the guidance document,
3 it's identifying the various control objectives and the
4 types of controls that need to be in place, albeit it is
5 not the -- the Tribal Working Group document, what it
6 did was remove the procedural steps out of the
7 regulation and really moved that philosophical approach,
8 if you will, into the guidance document. So you're not
9 going to see in the regulation proposal here, you know,
10 that a password has to be changed, has to be a certain
11 minimum length or, you know, two people have to do
12 something.

13 You're going to see that concept in the
14 guidance document, but it won't be in the regulation
15 itself. So I bring that up because this concept is
16 important to recognize that what we're trying to do is
17 move away from procedural steps being in a regulation
18 and allowing that same guidance to exist in the guidance
19 document, because I'm sure you can even appreciate that
20 the level of control can vary from facility to facility
21 depending on what the environment is or what level of
22 technology that facility has or things like that.

23 So where it may be appropriate at Facility A
24 that you have to have, you know, this manual
25 intervention of people to do certain things where

1 Facility B might be more automated -- they have more
2 automated controls in place -- they're achieving those
3 same objectives.

4 So the point that I want to make based on this
5 question is that I don't think that the Tribal Working
6 Group document is in conflict with any industry
7 standards. I think it's perfectly appropriate if the
8 guidance document were to reference various industry
9 standards, but none of those industry standards are
10 embodied in law in the sense that, you know, the U.S.
11 has adopted the COSO model, but even within COSO it's
12 not so specific to say, like, you know, ISACA, these are
13 the standards. I mean, I know many organizations that
14 balk at the ISACA standards because they're so
15 overburdensome and so costly to implement, that if you
16 were to take those standards as they exist published by
17 ISACA, it would be difficult to maintain the concept of
18 what you're talking about are outlined in the guidance
19 document when we talk about the types of controls that
20 need to be in place to mitigate the risk within the
21 gaming environment.

22 So when you first look at this regulation, it
23 looks like it's been completely gutted -- and that's
24 exactly correct, it has been gutted -- but it hasn't
25 been gutted and thrown out. It's been gutted, and the

1 control concepts and the objectives moved into the
2 guidance documents that really detail more specifically
3 here's what you should have in place and here's why and
4 that type of thing.

5 So that's why it's important just to clarify
6 that if you look at just this document by itself, you
7 would come to a conclusion that there are no controls in
8 place over at IT, and that's exactly what one would
9 conclude. So that's why it's important to bring up
10 about the guidance document.

11 So I would like to hear if you looked at the
12 guidance document, where you feel the guidance document
13 might also be lacking in regards to the concerns of this
14 question.

15 MICHAEL CURRY: And you bring up a very good
16 point here regarding the guidance document. That was
17 probably one of the areas I spent the bulk of my time
18 on, because, like you say, the reg itself, it's just a
19 few paragraphs, so other than five or ten minutes
20 reviewing that, a person's done. But the bulk of it,
21 like you say, it is in the guidance document.

22 And one of the points I wanted to ask you
23 is -- and this was not just so much with IT but with
24 surveillance and some of the other disciplines also
25 regarding having the guidance document there -- is by

1 what would constitute a gaming operation to refer to the
2 guidance document? See, the regulation obviously is a
3 regulation, so they're going to comply with that and go
4 along with that. The guidance document is just that,
5 it's a guidance document. Guidance doesn't mean you
6 have to use it. They can throw it out and download some
7 information off the Internet if they want since it's
8 guidance. It is very good guidance. I like it. As a
9 matter of fact, if I didn't know any better, I would
10 have guessed they took the guidance from out of our
11 previous reg and just titled it as "guidance." That was
12 my initial point, was --

13 ROBERT FISHER: I think they spent a little
14 more time than that.

15 DANIEL MCGHEE: That's what the guidance
16 document -- an example of the fact that -- previously
17 regulations were more procedural, so we moved a lot of
18 them that were good ideas into a guidance document.

19 ROBERT FISHER: Would it be useful to move to
20 a discussion of the questions that came out on the
21 guidance document rather than -- because in that sense
22 what he's challenging is the framework.

23 THOMAS WILSON: No, he's challenging because of
24 a lack of understanding of something, and this is
25 critical to make this point.

1 Our recommendation as a TAC are that the
2 guidance documents are part and parcel to the
3 regulation, so you cannot have one without the other.
4 The guidance documents are designed to be a safe harbor
5 so that if an entity -- here you have the regulations.
6 You have these guidance documents that are a part of the
7 regulation, part of the regulatory structure. If an
8 entity says, you know what, I can't go out and implement
9 ISACA standards, right, which is a common thing in the
10 industry -- some companies can meet certain standards,
11 other companies can't -- but I can't do these certain
12 things, the guidance documents are designed that if a
13 tribe were to follow the guidance documents at a minimum
14 and do nothing else, that the controls that are in place
15 in the guidance document are sufficient to mitigate the
16 risks at the entity.

17 But that a tribe can certainly go beyond the
18 guidance documents, and so, for example, there may be
19 some organizations, perhaps even in my organization,
20 that they say, you know what, we want to adopt more of
21 the ISACA guidelines, we want even a more robust,
22 controlled environment, we're free to do that. So it's
23 important to keep in mind that even though the term is
24 guidance, we've been very clear as a TAC that one cannot
25 exist without the other.

1 So the regulation as you see it here cannot
2 exist without the adequate guidance document or vice
3 versa, because the two have to work together.

4 MICHAEL CURRY: And if I may interject along
5 the way here, how is that to be, I guess to use the
6 word, "enforced" in the gaming operation?

7 THOMAS WILSON: Well, your attorney would have
8 to answer that question.

9 MICHAEL CURRY: And, again, I agree with what
10 you're saying. Like I was saying earlier, I love the
11 guidance document so much that if there were in greater
12 (inaudible) to the reg itself, I'd be happy with
13 everything.

14 But see, that's my question, is the guidance
15 document -- once it gets out into the field in that
16 remote site out in New Mexico somewhere, how do I know
17 how -- or do we know that when they picked up the reg,
18 they also picked up the guidance document and used them
19 both together?

20 ROBERT FISHER: Can you use the mike so we can
21 get a test on the -- and apparently -- hold on, Daniel,
22 I'll come to you in a second.

23 So the way the mikes work today is that they
24 time out, but you have to keep -- the red light will go
25 off, just push the button again and it will go back on,

1 and he said he would fix the mikes tomorrow to get rid
2 of the timeout.

3 THOMAS WILSON: I just want to follow up and
4 then somebody else can speak on this. I'm encouraged to
5 hear that you find the guidance documents -- I mean,
6 you've answered the first question, which is the
7 guidance documents are very sufficient, if somebody
8 followed the guidance documents that they're mitigating
9 the risk, so I'm happy to hear that from somebody from
10 NIGC acknowledging the guidance document meets that
11 criteria.

12 So it's really for your legal counsel to
13 explain how the guidance document comes into play, but
14 essentially every organization still has to submit their
15 internal control structure for review and approval. So
16 just because Property A may word the control this way
17 and Property B words it this way is not a disqualifier.
18 It's looking at is it meeting that control objective.

19 MICHAEL CURRY: Exactly. It's the end result
20 as well as to provide the -- how you get there, is
21 really up to the gaming operation itself, so we're
22 looking at the end result. I'm sorry, go ahead.

23 THOMAS WILSON: Well, I was going to say, so
24 keep in mind that the Tribal Gaming Regulatory Authority
25 as the primary regulator are the ones who approve those

1 internal controls, so when you say who is going to
2 ensure them, the NIGC ensures that that happens by
3 virtue of the tribal gaming regulatory authorities that
4 have to ensure that those controls are in place in line
5 with the regulations in the guidance. So that's what I
6 can tell you about that.

7 MICHAEL CURRY: Sure.

8 ROBERT FISHER: That's not necessarily -- I
9 mean, we can't enforce the guidance, there's no -- so we
10 can't enforce the ordinance.

11 DANIEL LITTLE: I think it would be helpful,
12 let's move to the specific question we've got on the
13 guidance and regulations. I think we can --

14 ROBERT FISHER: Before we do that, both Matt
15 and Daniel had something that they wanted to say, so
16 let's take those two comments, then we'll move to the
17 question on the guidance.

18 Daniel, you get to go first.

19 DANIEL MCGHEE: (Inaudible.)

20 ROBERT FISHER: Daniel, you need to amp it up a
21 lot.

22 DANIEL MCGHEE: One way is that -- you can do
23 it, if you took this guidance document, that's one way
24 the tribe would be in compliance. If you all came in
25 and they looked at these, they're meeting the regs that

1 were set forth by NIGC if they follow these guidance
2 documents.

3 Or they can do an alternative to these guidance
4 documents as long as they're still meeting the control
5 that is in the reg. That's the only thing that's really
6 important. If they enforce that you must have control
7 of physical security of the system and then you look
8 over here, we have an example of how you can do that,
9 because they have come up with another example, and then
10 if NIGC were to come in and they're doing an audit or
11 whatever and they're looking at that, at that point I
12 would say, you know, NIGC would have to either agree or
13 disagree that the standard you have in place does
14 physically, you know, have control over the system,
15 whether it be the guidance document way or another way.

16 And if the NIGC said it didn't, then you would
17 do what you would normally do at any other place if you
18 went in and did a review and it didn't meet it, you
19 would write this is not a proper standard and then they
20 would have -- it would be a working progress of, okay,
21 how do I get my standard to meet what you're talking
22 about. So it's just an example.

23 So hand in hand means you can't have this
24 regulation without NIGC putting in force some kind of
25 guidance on how I can meet that, but that doesn't mean

1 that's the only way I can meet that, and that's the
2 concept of this whole thing.

3 So what you were saying about the guidance
4 documents being able to do that, what's important is if
5 the reg has addressed each important subject matter, you
6 know what I mean, that a control should be in place for
7 it, and then a guidance document is more this is an
8 example of how I can do that. In the the regulation,
9 meaning, yes, I agree these are the areas that should be
10 controlled, and then as a guidance document, put forth
11 as an example of how to control that.

12 Or if there's something missing in the guidance
13 document, or if there's specific subject matters that's
14 missing out of the regulation, then we should consider
15 putting it into the regulation; meaning, not just
16 physical security, you left out logical security, and
17 then you say a control should be in place to protect the
18 logical security. So did we leave that out. And that's
19 what's important, and then making sure it's addressed so
20 that NIGC gives an example of how to meet that
21 regulation.

22 ROBERT FISHER: Matthew.

23 MATTHEW MORGAN: I'm going to defer right now.

24 ROBERT FISHER: Okay.

25 MICHAEL CURRY: Okay. So we have the comments

1 made then. All right. I'll go ahead and I will revert
2 back to -- again, this is on page 14 of 19 in the IT,
3 the comparison. Up in blue, on the second paragraph in
4 regard to the title of the MICS itself, This proposal
5 Class II suffix in the title is redundant being that the
6 regulation resides in the Class II regulation itself,
7 which is called out, Class II, in the name of the
8 heading is redundant. Would retaining information and
9 technology or a similar variation in the title more
10 easily allow it to be referenced and identified by
11 tribal regulatory authorities and audit personnel?

12 In my opinion, yes. Reverting it back to
13 information technology, for one, information technology,
14 the title itself has been around since the 1970s.
15 Everyone knows or at least is somewhat familiar with
16 what is under the umbrella of information technology;
17 computer server, software, things of that nature.

18 When I refer to the suggested change, you know,
19 again, my apologies, I don't even know what they're
20 referring to and I know the folks out in the gaming
21 operations, particularly those out in the far-away
22 gaming operations, will have no idea what the -- let me
23 get the revised name down here. They would have very
24 much difficulty understanding what security and
25 management of server, server software, and data

1 associated with Class II gaming systems is. I, myself,
2 couldn't -- I'm sorry?

3 ROBERT FISHER: So let me just make a request.
4 For the people in the audience, let him pose the
5 questions, and then if you want to make a comment, you
6 can do that when we get to the public comment period.
7 And if he is doing something that's wrong, tell somebody
8 else at the table and they'll figure it out, if you
9 could.

10 MICHAEL CURRY: If I might ask, what's the
11 rationale for this choice here as opposed to going away
12 from information technology?

13 ROBERT FISHER: Matthew.

14 MATTHEW MORGAN: The rationale behind it is
15 that NIGC is an agency of limited jurisdiction, and when
16 you use an all-encompassing term such as IT, we don't
17 have authority within your agency or within your minimum
18 internal control standards to regulate everything under
19 an umbrella as broad as IT.

20 So within a Class II environment, these are the
21 areas that are at most risk that we believe from a
22 Tribal Gaming Work Group perspective needed to have
23 controls put forth to mitigate some of these risks, and
24 that was why these were very wordy; it clearly
25 identifies what the subject matter and activities are

1 that need to be controlled.

2 And what worries me, and my comment earlier
3 when I deferred, is it's very clear when, from comments
4 that I get and we see from the agency that this was done
5 piecemeal, because one of your comments was, well, Class
6 II is redundant -- it's in Class II -- but Class II
7 Gaming Systems, it's a defined term. It's used very
8 specifically. That's the reason it says Class II Gaming
9 Systems. And if you read the document in its entirety,
10 you see some of those aspects that come through there.

11 So the reason that that was termed just a
12 generic IT was changed to look at -- and it's a
13 mouthful, "Security and management of server, server
14 software, and the data associated with Class II Gaming
15 Systems," that is the belief from the Tribal Gaming Work
16 Group, and at least at this point until we discuss it, I
17 guess that's where we reside at at this body, is that is
18 areas that need to be controlled and that we can have
19 that discussion with the NIGC on this because that is
20 the smaller areas that you have.

21 And if you run a Class II gaming operation, you
22 know what those things -- you can't get off the ground
23 without knowing what that is. And how do they find out
24 about some of that stuff? Well, that's one of the
25 things that we continue to talk on when we shift focus

1 from enforcement over to guidance, bulletins, technical
2 assistance, training, so locations aren't out there, so
3 as the NIGC staff goes out into the field, if they
4 perceive that somewhere is lacking, they have those
5 built-in departments, institutional knowledge, expertise
6 available to assist that tribe in coming up and meeting
7 that standard.

8 To just say, well, a far-away tribe doesn't
9 know that is wrong, just because they're far away does
10 not mean -- every tribe has weaknesses, every tribe has
11 strengths, but when you operate in a Class II
12 jurisdiction, you understand what a Class II Gaming
13 System is and what is all-encompassed with that.

14 Any type of new game you go into, if you've
15 never had poker, if you've never had blackjack, you
16 don't run out and start running it without putting in
17 the due diligence necessary to go out and talk with
18 people, call your agency, talk with him, talk with your
19 fellow regulators, operators, get some documents in
20 place to make sure you have some internal controls and
21 procedures. This is but one small tool to use in the
22 entirety of both on the operational side and the
23 regulatory side.

24 ROBERT FISHER: Go ahead, Daniel.

25 DANIEL MCGHEE: The only part I agreed with

1 with your comment is that it is hard to refer to the
2 section quickly. Because even in this process, it's
3 been, you know -- the new information technology is part
4 of system server something, something, you know what I
5 mean. So I'm not opposed to this somehow being -- I
6 agree with the information technology, but from my
7 standpoint I'm not opposed to somehow meeting the same
8 objective TGW is trying to get to in that same time
9 shortening the step so it's easily referred to. So I
10 get your comment that that could be a problem.

11 ROBERT FISHER: And, Matt, from what you were
12 saying, it sounds to me like the reasoning for changing
13 the title is to just specifically spell out what, in
14 your opinion, the authority of the commission is.

15 MATTHEW MORGAN: Specifically to spell out what
16 activities need to be controlled when you're looking at
17 a Class II Gaming System. You have to look at security
18 and management as well as the server. You have to also
19 look at the software on the server and any of that
20 associated with those two. Those are the three areas
21 that you need to be concerned with.

22 So I don't know if it's so much of a
23 jurisdictional issue as it is those are the activities
24 that pose risks. They're very narrowed down. But I
25 will say I'm in agreement with Daniel, if there's a

1 better terminology for that that more accurately
2 describes, that would be wonderful, because that is
3 something that we did struggle with, that the Tribal
4 Gaming Work Group product is -- everybody understood
5 when we come out with that name, it doesn't roll off
6 your tongue, but nobody came out with a better
7 alternative.

8 So, I mean, if there's a better alternative
9 that still accurately describes activity needs to be
10 controlled, we couldn't come up with it, so I don't know
11 what that is. So I'm with Daniel, I'd be open to
12 hearing some discussion if there's a better terminology
13 to use.

14 MICHAEL CURRY: Check IT controls for
15 independence, and that's under (c)(5), (d)(1), they
16 removed the TGRA as the approving authority to decide
17 whether to allow IT personnel to handle cash instruments
18 under proper oversight and approval. What was the
19 reasoning for this change?

20 ROBERT FISHER: Go ahead, Kathi.

21 KATHI HAMEL: I believe (a) is in every one of
22 the regulations that again reiterates that the TGRA is
23 the one that has the control over the entire approval
24 and oversight.

25 ROBERT FISHER: Mike, do you see she's taking

1 you back to Section A up there on the screen?

2 MICHAEL CURRY: Back to the TGWG.

3 ROBERT FISHER: Right.

4 DANIEL MCGHEE: This is in the guidance
5 document --

6 ROBERT FISHER: No, this is in the regulation.

7 KATHI HAMEL: This is in each regulation
8 section. There was discussion of removing it and making
9 it overall, but we struggled as a group in writing the
10 detailed controls, if we didn't put this at the
11 beginning of every section.

12 ROBERT FISHER: "We" meaning the TGWG?

13 KATHI HAMEL: The TGWG, uh-huh.

14 ROBERT FISHER: So that section (a), Mike,
15 that appears here, appears in almost every section as a
16 way to say who starts, where it starts.

17 Okay. So are there any other questions on the
18 regulation language? Do you want to move to the
19 guidance?

20 DANIEL MCGHEE: I'm just checking that real
21 quickly.

22 ROBERT FISHER: Go ahead.

23 MATTHEW MORGAN: Where is that specific
24 reference that (c)(5), (d)(1)?

25 ROBERT FISHER: It's in the reg itself, that's

1 the reference. So what page on the -- in the --

2 KATHI HAMEL: (C)(5) is a different regulation.

3 MICHAEL CURRY: It was basically a standard a
4 couple pages long.

5 DANIEL MCGHEE: Yes. That first one kind of
6 put one sentence in there, that would be, "TGRA has the
7 authority to approve," blah, blah, blah, so it's not
8 specifically to take it from somewhere else but it's at
9 the beginning of every section, if that answers your
10 question.

11 ROBERT FISHER: Which page in the comparison
12 document are you looking?

13 Give him a second. He's trying to orient
14 himself in the document, so we don't have his attention
15 yet. So wait a second if you're going to do that, then
16 we've got to come back so the whole group can hear
17 what's going on. He's trying to get oriented, so what's
18 the question you've got?

19 MICHAEL CURRY: Well, one was just the
20 nomenclature referring to (c)(5), (d)(1) for starters.
21 But then I think you --

22 ROBERT FISHER: Okay. So let's take a pause
23 for a second. Jeff's got a question.

24 JEFF WHEATLEY: So the question is that the
25 revision kind of takes away the ability of anybody that

1 has access to Class II services from having any
2 involvement with financial instruments that's been taken
3 away, and that authority's been stripped from TGRA to
4 allow them to spell out which personnel can under a
5 certain oversight?

6 MICHAEL CURRY: Well, that's what we wish to
7 avoid.

8 JEFF WHEATLEY: Because right now the way it
9 reads to me is it is not allowed at all.

10 MICHAEL CURRY: Allow the cash and cash
11 equivalents?

12 JEFF WHEATLEY: Right.

13 MICHAEL CURRY: True, and that shouldn't be the
14 case as far as not allowing. I mean, with TGRA
15 approval, they should be able to allow pretty much
16 anyone along as they've probably vetted through.

17 JEFF WHEATLEY: That's what I wanted to
18 understand, is why there's not authority for the TGRA to
19 allow that in certain cases.

20 DANIEL LITTLE: What page?

21 JEFF WHEATLEY: If you look on that final
22 draft, it's page two.

23 MICHAEL CURRY: To totally negate and say no,
24 no one regardless of TGRA approval, yes, I mean, we
25 certainly want to avoid that.

1 DANIEL MCGHEE: So would a suggestion be
2 "unauthorized access" because the TGRA has the authority
3 to authorize it under the (d)(1) -- I mean (d), All
4 personnel having access to server, server software
5 and/or data are independent or restricted from
6 unauthorized access to 1, 2, 3.

7 MICHAEL CURRY: That's the key word is
8 unauthorized.

9 DANIEL MCGHEE: You can't hurt it by adding
10 that, and then at the same time --

11 JEFF WHEATLEY: Well, I think there's certain
12 instances where you might want to allow that under
13 "oversight."

14 ROBERT FISHER: Which means that that's a good
15 change or not a good change?

16 JEFF WHEATLEY: I think you can read it that
17 way.

18 ROBERT FISHER: Okay.

19 KATHI HAMEL: And the same language goes in
20 (c)(5).

21 DANIEL MCGHEE: (C)(5) is a mistake. I don't
22 see reference to (c)(5).

23 KATHI HAMEL: It talks about financial
24 instruments.

25 ROBERT FISHER: So the changes that are up on

1 the screen in (c)(5) and D, the introduction to D, by
2 including the word "unauthorized," does that get at what
3 Mike is saying and that that sounds like it's responsive
4 from at least some members of TAC? So we'll have to
5 check and see if that works for everybody. But right at
6 the moment that addresses the concern that you raised,
7 Mike.

8 All right. Matt.

9 MATTHEW MORGAN: My question has to do with the
10 specific section. In (c)(5) you're talking about the
11 departmental independence, and then D you're just
12 talking about the personal, individual independence and
13 restrictions. Does that change your stance at all?
14 Because those are two very different levels depending on
15 whether you work in the same department versus whether
16 you individually are conflicted out.

17 And I ask that because we made the same changes
18 to both, which basically says "TGRA can allow," but does
19 that allow -- is that going too far, I guess is my
20 question for the group.

21 ROBERT FISHER: Kathi.

22 KATHI HAMEL: I'm not responding to what Matt
23 had to say, but there needs to be a change in D to
24 remove the word "personnel" and put "agents."

25 ROBERT FISHER: Okay. So anybody want to

1 address Matt's question?

2 DANIEL MCGHEE: As far as that departmental
3 independence, and that "included but not limited to" is
4 really just an example, you could technically delete
5 that whole part. It's just to give an example of what's
6 already stated in (d)(1) anyway, so "departmental
7 independence, including but not limited to," anything
8 that falls after that is just an example.

9 Either way. I mean, it's a good example, but I
10 think the "unauthorized" is fine being there because
11 it's really kind of already saying what (d)(1) says.
12 We're just using it as an example in 5. So you don't
13 have to, it's just not as important, but I do think it
14 should be in both sections.

15 ROBERT FISHER: Okay. All right. So, Matt, do
16 you want to test your question about whether it's
17 appropriate in both sections or you're okay with it the
18 way it is?

19 MATTHEW MORGAN: My question was more to
20 promote discussion, you know, where's the line at, is
21 that too far or not far enough. That's the only thing I
22 was looking for is discussion.

23 MICHAEL CURRY: And again, just to reiterate
24 your question or your concern, you're looking at either
25 a departmental level, which is all I'm really concerned

1 about, or versus, I don't know, there's family members
2 that are not independent of departments, things of that
3 nature. Is that what I understand?

4 Okay. For clarity purposes, I don't know if
5 you asked the question, but I'm looking at a
6 departmental level. As far as an organizational
7 independence or whatever the case might be, that falls
8 out of my purview.

9 MATTHEW MORGAN: One of the reasons I asked,
10 one of the things we tried at a Tribal Work Group level
11 was to try not to put such parameters around what a
12 department may be called or whether you're Department A
13 versus Department B. It was more your individual
14 functions in looking at your conflicts of interest and
15 where the risks are. And here we went back into and
16 talked about departmental independence. And you tell me
17 your focus at that departmental level is to make sure
18 there's independence.

19 But from a working group perspective, that
20 wasn't the overarching concern. We didn't care if you
21 were in bingo sales and maybe F&B, because maybe at some
22 point -- even though you're in F&B, at some point in the
23 shift you did take over and you went into sales or
24 something that was more important to us, that we make
25 sure those conflicts didn't happen, that we were looking

1 at more of an individual level conflict and not a
2 departmental level.

3 DANIEL MCGHEE: Does 5 say the same thing that
4 D says? I mean, isn't D, all of D what you're saying
5 about 5? Am I wrong? Because in D you do talk about
6 any one agent or agents versus department. But, for
7 example, if 5 weren't there, would D still cover what
8 used to be there or not?

9 KATHI HAMEL: I think so.

10 MATTHEW MORGAN: My question then would be D is
11 personnel having access to -- what if you don't have
12 access to but you grant the authority to have access to
13 and so your department needs to be independent from
14 those people at some --

15 DANIEL MCGHEE: -- restrict agents that have
16 access to servers. It says it again.

17 MICHAEL CURRY: The form would be "agents."

18 ROBERT FISHER: Okay. So do you want to make a
19 suggestion to change it or --

20 DANIEL MCGHEE: I mean, unless I was missing
21 something, maybe we're repeating each other. Maybe
22 someone would read it differently.

23 MIA TAHDOOAHNIPPAH: I kind of read it
24 differently because I see that the department --

25 ROBERT FISHER: Please put your mike on.

1 MIA TAHDOOAHNIPPAH: I kind of see it as, like
2 you would say here, on September 5 that the
3 department -- you specified specific departments that
4 have to have independence. And then on (d)(1) -- you
5 know, I just read them different. Because I read in
6 that there's been some agent, but then -- right, okay,
7 what if tomorrow I allow him to have this access, but if
8 he's in that one department that it seems to be
9 precluded from, then that would violate that, so --

10 ROBERT FISHER: So we also need a little time
11 check. We've got about five more minutes before we're
12 scheduled to stop the discussion and shift to public
13 comment.

14 DANIEL MCGHEE: Just to address her, would it
15 be to say, "controls must be established to ensure" and
16 just say "departmental independence," period. Because
17 then when you go further is when you start talking about
18 an agent, which is what you're talking about in (d), so
19 your control must make sure departmental independence is
20 in place.

21 ROBERT FISHER: You mean just getting rid of
22 that?

23 DANIEL MCGHEE: Technically you could just stop
24 it at "departmental independence" and then it addresses
25 individuals in the next sentence, which is what the rest

1 of that sentence does. Do you see where I'm going with
2 that? So maybe that would take away the confusion.

3 ROBERT FISHER: Does that help or --

4 MICHAEL CURRY: Certainly.

5 ROBERT FISHER: It would. Okay. So the
6 suggestion was to delete after the word "independence,"
7 from (c)(5) all the way to the end, which is the
8 "including but not limited to" example that's given
9 there.

10 All right. Anybody have a problem with that?
11 We're not testing it formally yet. We will when we come
12 back to close out the section, but anybody have a
13 reaction to that or a problem with it? Raise any issues
14 for anybody?

15 (No audible response.)

16 ROBERT FISHER: Okay. Was there anything else
17 on the regulation before we move to the guidance that we
18 need to talk about?

19 REST WEST: I understand that the focus is on
20 the Class II Gaming System, but what about the other IT
21 systems that are, I guess, important to Class II gaming,
22 such as accounting software and servers, whatever other
23 possible systems that are necessary for Class II gaming?
24 So it seems to narrow the focus to the actual game
25 itself. What about the other important IT functions,

1 software, whatever, that I think should be part of this?

2 ROBERT FISHER: Go ahead, Kathi.

3 KATHI HAMEL: In (c)(1), control of physical
4 and logical access to server, server software and data
5 associated with Class II including" (inaudible).

6 DANIEL MCGHEE: If I'm understanding that,
7 basically it means any system, and you're saying that
8 it's associated with a Class II system, and the system
9 needs to have the same control, so that would include
10 the all-associated systems that he's talking about, such
11 as the financial and other things, if it is part of that
12 or even if it's pulling from that system, information or
13 data, unless you're talking about just whatever
14 accounting software.

15 REST WEST: It just seems to me, when you look
16 at the stance of the section, it applies only to the
17 gaming system, and one would think that it doesn't apply
18 to other, what I would think, are necessary parts of
19 Class II gaming.

20 ROBERT FISHER: Is that because the title here
21 has "Gaming Systems" in it?

22 REST WEST: That whole section is Class II
23 gaming systems, so your accounting (inaudible) on these
24 servers, like some of the collection services, that they
25 not necessarily be the ones that you would record your

1 financial (inaudible).

2 MICHAEL CURRY: And I agree with Rest. That
3 was a concern of mine also, is that it almost
4 pigeonholes it, so to speak, and say okay, if it falls
5 outside the purview of the server or the server software
6 or the data associated with Class II MICS, then it
7 doesn't apply. But in an IT environment, again, from a
8 professional environment, an IT environment, it is so
9 complex and so intertwined with everything else that you
10 have going on.

11 Nowhere out there -- I wouldn't even expect to
12 see the word "printer" up there, but a printer is a key
13 element within that Class II environment. If we could
14 shy away from even calling out servers themselves,
15 because server -- and, again, when write up regs and
16 guidance, the terminology itself is antiquated and old
17 within a year and a half. I mean, we found that out
18 with a number of different software systems; we'll call
19 them software and now we call them application systems,
20 things of that nature.

21 So, again, I'd have to agree with Rest, that
22 once we start pigeonholing ourselves and minimizing and
23 saying, okay, this part of the system applies but this
24 part of the system over here doesn't apply, that's not
25 true. None of use really has the background or the

1 capability to map out the flow of data through a gaming
2 operation a Class II -- particularly an operation that
3 has Class II and Class III, where do you draw the line
4 at? You don't.

5 I mean, a system is a system. An application
6 is going to run a data backup or recovery is all going
7 to be encompassed under here, but it's not even
8 included. I mean, we're dealing with servers. The
9 desktops themselves, someone could read this and say,
10 okay, this applies to servers. In the IT department
11 it's servers and all the little desktops that we all
12 have in our cubicles and in our offices. It's the whole
13 environment itself.

14 And to draw the DMZ line and say, okay, well,
15 the reg applies up to here and then it cuts off,
16 everything else is not applicable, it's impossible to do
17 that. It's impossible to do. It's either all
18 encompassing or it's not.

19 ROBERT FISHER: Okay. So I'm going to ask you
20 to stop right there. We've got one more comment from
21 Matt and then we're going to pause and provide time for
22 public comment, and then we'll pick this up again after
23 we're done with lunch.

24 Go ahead, Matt.

25 MATTHEW MORGAN: One, you can't segregate, and,

1 again, these only apply if you have that capability. If
2 you're a system that doesn't have any bank office for
3 player tracking, then that stuff wouldn't apply, but if
4 you go back and read the Class II gaming system
5 definition, which is very key in there, because we've
6 defined that word of what that all encompasses.

7 Two, I think you have to keep in mind you guys
8 are not the only tool in the bag. There are other
9 people out there looking at both federal level, state
10 level, if you have a compact, and tribal level. There
11 are all kinds of people out there looking at this
12 subject. And just because it may not be in your tool
13 bag does not necessarily mean it's not getting done.

14 And that's why I think it is very important
15 that as a part of this process you look at trying to
16 determine how do you deliver items that are outside of
17 your tool bag. There are other items that are risks
18 that need to be controlled that may necessarily -- you
19 may not have the authority to, it may not necessarily be
20 the state, it may just be the tribes, but they do need
21 some training and technical assistance in that area, and
22 to focus on it's not in this document alone is a little
23 bit -- I guess to follow-up on your point, it's still
24 part of the system. And at a local level, we have to
25 see that, how that all works together.

1 So I'm really not for sure on when Rest's
2 question said, well, I don't see it, and Kathi pointed
3 out the exact language, you said I'm concerned about
4 accounting, accounting's in there. Talk about vouchers,
5 vouchers are in there. If it's any system associated
6 with a Class II Gaming System, all components -- whether
7 or not technological aid in electronics, computer,
8 mechanical or other technological forums that function
9 together to aid the play of one or more Class II gaming,
10 including accounting function mandated by Part 547,
11 that's all included within there. And when you use that
12 definition, all that stuff comes in. You have to be
13 aware of that.

14 ROBERT FISHER: Okay. So let's pause here and
15 we'll come back to this discussion when we reconvene.
16 I'm assuming we're going to break for lunch after public
17 comment.

18 And so we've had one person that I know of who
19 asked to provide public comments. If there's anybody
20 else in the audience that wishes to provide public
21 comment, at this point we'll make that opportunity
22 available. And our procedure for doing the public
23 comment is that each person who wishes to speak is given
24 three minutes to talk.

25 And would you do our timing again, Daniel?

1 And then there's an opportunity for the
2 committee members to ask any questions if they so
3 choose, but our process is also that we're not expected
4 to provide a direct response back to any comment that's
5 given in order to give the opportunity for the committee
6 to consider the information and respond to it
7 accordingly.

8 With that, let me turn to you, Mr. DesRogiers.
9 Did I get that right? And you're up.

10 NORM DESROGIERS: Norm DesRogiers, Commissioner
11 for San Manuel. Thank you very much. I thought I had
12 the whole 15 minutes, but a couple of comments and
13 questions. First, thanks. I didn't realize until I got
14 here, apparently you're done with 547. I hoped to hear
15 some discussion on it, but that's great. It's even
16 greater if you incorporated my comments in what was
17 finally produced, and I want to ask about that in a
18 moment. And I'm really pleased to hear that you
19 progressed here into 543 because, I mean, the regulatory
20 community has been operating handicapped out there with
21 no minimum internal controls to support Part 547. So
22 this is great. I can't wait until you're done.

23 Let me ask a couple of questions. Did the
24 committee members all get copies of all submitted
25 written public comments on the working group draft?

1 ROBERT FISHER: On the Tribal Gaming Working
2 Group draft?

3 NORM DESROGIERS: Part 547, the Indian Gaming
4 Working Group produced a document that was published for
5 comment.

6 ROBERT FISHER: I think what we're going to
7 have to do is, you're going to have to pose your
8 question. We're not going to be able to respond to them
9 right now.

10 NORM DESROGIERS: I had a number of comments on
11 that, which, you know, pertained to Part 547, only four
12 or five issues, but two that I was kind of passionate
13 about. So since you've kind of gone through all that
14 already, I just have two questions on the two parts that
15 I was particularly interested in. Does anyone recall
16 what your final recommendation was for the entertainment
17 display, last game recall?

18 ROBERT FISHER: We haven't worked on Part 547
19 in two meetings, so we are scheduled to talk about it on
20 Thursday, so maybe if you put the questions out, then
21 maybe we can make sure we come back and address those
22 questions, but it's on the agenda for Thursday.

23 NORM DESROGIERS: Okay. Well, that's one of
24 them, and I'm not going to be here Thursday. I didn't
25 think -- okay.

1 The other one, then, deals with the odds, you
2 know, the fairness deal, and are we going to have any
3 minimum odds required or is that going to be an
4 unregulated thing? Because the way it's written, let me
5 remind you, simply says -- or the way it was proposed by
6 Indian Gaming Working Group doesn't set any standards.
7 It says the lab will test to see what those odds are and
8 let the tribe know. It does away with the standards
9 that were previously set. So does anybody remember
10 whether that was changed or not?

11 DANIEL MCGHEE: All I can do is address the
12 question, go back and look and see what was --
13 (inaudible).

14 NORM DESROGIERS: Okay. Well, those are my
15 questions. Thanks. I won't take anymore of your time.

16 ROBERT FISHER: I'm guessing. I think if I
17 remember correctly, and I may not remember correctly,
18 that there are minimum odds but it's different than --
19 they're different than what was -- there was discussion
20 about it, so we did talk about it and we can check that
21 before you leave. I can tell you what's in the current
22 draft before you leave today.

23 NORM DESROGIERS: Well, I appreciate that. You
24 know, we're a little at a disadvantage, except those who
25 have been in constant touch with committee members, but

1 those of us who haven't, I guess I assumed there were
2 going to be regular drafts posted on the Web site with
3 the progressive product that's being developed. And,
4 granted, I'm technologically challenged, but I haven't
5 been able to find anything out there so we can keep
6 abreast of what the product has been developing as. So
7 it's kind of tough for us to come in here and make any
8 intelligent comments, I guess, without knowing what's
9 going on.

10 ROBERT FISHER: Sure. So the group is working
11 through those documents. They're making
12 recommendations. The recommendations are getting
13 captured in the documents, and at some point those draft
14 documents will get put up on the Web site so everybody
15 can check it out.

16 Michele. And then I will come back to you. Go
17 ahead, Michele.

18 MICHELE STACONA: I am wondering, if he did
19 make and submit comments to NIGC, I thought we agreed
20 that you would put them on the Web site so we can look
21 at it, and I just pulled up your Web site and I believe
22 his comments aren't on there.

23 DANIEL LITTLE: I'll address both. First of
24 all, Michele, they are on there. They may not be under
25 the Tribal Advisory Committee, they may be under the

1 consultation section, but they are because I think they
2 were in reference to a whole number of areas. So they
3 are online because I've read Norm's comments. So they
4 are online. They may not be in the tribal advisory
5 committee section, but I can find out at break.

6 But, Norm, I appreciate your comments, and
7 thanks for coming here today. It's always an honor to
8 have a former commissioner. And I didn't probably point
9 out earlier, and I apologize, we've got three or four
10 members of the commission here: Liz Homa, Terry
11 Thompson, and, of course, Norm. It's always great to
12 have you guys here as a commission. It's an honor to
13 have you here, so thank you, all of you.

14 But your comments are online, Norm, and I think
15 this TAC is working a little differently than in the
16 past where we were putting up drafts. The advisory
17 committee is preparing suggestions -- suggesting
18 comments or, you know, recommendations to the commission
19 for moving forward with a regulation, so you won't
20 necessarily see a draft up online. When they do come
21 out with their recommendations, we'll be posting that,
22 so that's what you'll see online, but your comments that
23 your tribe has submitted is online there. It's probably
24 under the consultation section, but I will find out
25 during the break. So, once again, thank you for the

1 comments.

2 ROBERT FISHER: Christinia.

3 CHRISTINIA THOMAS: Just so Dan doesn't have to
4 locate it, it's under Consultation under Regulatory
5 Review under Group 3.

6 DANIEL LITTLE: Thank you.

7 ROBERT FISHER: Okay. And as I said, I'll
8 double-check the questions that you raised when we break
9 for lunch and make sure that we give that information to
10 you, and I will make sure it goes on the record here.

11 All right. So is there anybody else in the
12 audience that wishes to provide public comment to the
13 committee at this point?

14 (No audible response.)

15 ROBERT FISHER: Okay. So hearing nobody step
16 forward, that means that we're a little bit before noon.
17 Our appointed time for breaking for lunch is noon. So
18 should we break for lunch now? And when we come back
19 we'll pick up on 543.16 on the conversation we just had
20 about the title and what's covered and what's not
21 covered and what the intentions are.

22 So we'll start up again at 1:00.

23 (Lunch Recess.)

24 ROBERT FISHER: Back on the record. Welcome
25 back everybody. Let's pick up where we left off before

1 we stopped the discussion in order to take the
2 opportunity to get public comment. And we were talking
3 about 543.16 and, in part, we were talking about -- we
4 were still talking about the regulation we hadn't moved
5 yet. We were talking about the guidance, and I want to
6 just check to see, before we move to the guidance,
7 whether anybody has anything else on the regulation that
8 you want to raise or whether there's anything more that
9 we need to do to the guidance. In particular, people
10 raised some questions about what was covered and the
11 title, the name of that section, and I'm wondering
12 whether there's any impetus to change the title of that
13 section or whether we're good with the regulation and we
14 should move to the guidance?

15 (No audible response.)

16 ROBERT FISHER: Anybody have anything else on
17 the regulation? All right. So maybe we'll cycle back
18 to the -- oh, I'm sorry, Robin, go ahead.

19 ROBIN LASH: I just wanted to comment briefly.
20 Every time we come together at these meetings, we do
21 meet additional NIGC staff, and I'm kind of concerned
22 because the concept and the products that we're
23 proposing is very different from the MICS that are in
24 place that's laden with the procedure.

25 And the intention of the Tribal Gaming Working

1 Group document was to take that procedure out of the
2 regulation and just give the regulation, give a guidance
3 document that's a safe harbor for tribes, or they can
4 make it more stringent. And I just don't feel like the
5 NIGC offices, the staff back at the office are getting
6 that.

7 You know, we do get the same kind of questions
8 and I don't know how I will feel more comfortable,
9 because when we finish this process this week, and
10 unless NIGC would participate by phone in our Arizona
11 meeting -- and perhaps that's a good idea because you
12 can have a dozen people in the room without paying their
13 expenses without actually physically be there -- they
14 could then ask questions to this group about the product
15 that we're putting forward because it does require an
16 understanding that everything reads together.

17 So I guess my comfort level is kind of shaken
18 because I don't think that's understood back at the
19 office with the people who are going to be drafting this
20 final document. So that's just a concern I'm wanting to
21 state.

22 DANIEL LITTLE: That's a good point. I can
23 definitely understand where you're coming from, Robin.
24 The folks that are going to be drafting any proposed
25 regulation is going to be the Commission along with the

1 general counsel's office, which is Mike Hoenig, who has
2 been here at all these meetings, and we rely a lot upon
3 our audits and other staff, such as Nimish Parohit.

4 But that's why, when we were talking about this
5 earlier, why it is important that Rest has a good
6 understanding and Mike Curry does, because we rely on
7 their expertise. They've been here a lot longer than I
8 have and they understand these issues, you know, from a
9 minute-specific on-the-ground perspective that is very
10 valuable. So I'm not really sure there's others back at
11 headquarters that -- you know, we would obviously rely
12 on some other folks in the office of general counsel,
13 but he primarily is the team that will be working on
14 drafting the regulation. So I understand your concern,
15 and hopefully as we get through this that will be
16 alleviated a little bit.

17 ROBERT FISHER: Okay. Anybody have anything
18 else either generally or on the regulations before we
19 get going?

20 (No audible response.)

21 ROBERT FISHER: Okay. So the regulation is
22 still projected up on the screen. I don't have the
23 guidance documents to project up on the screen for those
24 of you in the audience. There were some questions that
25 were raised about the title of this and whether there

1 was a better title that could be used that was easier or
2 more informative or something else.

3 And so do you want to spend any time talking
4 about that right now or you want to move to the
5 guidance? Anybody have an idea for or a suggestion for
6 a different title?

7 (No audible response.)

8 ROBERT FISHER: Okay. Let's move to the
9 guidance. So in the document, I think in the comparison
10 document that NIGC put out, the first guidance question
11 is over on page 15, if I have that right.

12 MICHAEL CURRY: Welcome back from lunch,
13 everyone. I'm going to pick it up again on the first
14 section of page 15 of 19 regarding what is the minimum
15 internal control standards for information technology,
16 but, again, we're taking into account the potential of
17 the title being changed.

18 Under the first NIGC question, referencing
19 working group, 543.16 (c)(5), the working group proposal
20 references the term "agent." Due to the ambiguity
21 between human agents versus software application agents,
22 what would be a better approach to replace or to define
23 the parameters of the term "agent" more clearly?

24 ROBERT FISHER: We talked about this before
25 when Nimish talked about (inaudible) the 547. Were

1 there any other comments anyone wanted to add to that?

2 Kathi.

3 KATHI HAMEL: I would like to clarify. Is your
4 question related to the regulation or to the guidance
5 document? Because there is no (c)(5) in the guidance
6 document and there's a (c)(5) in the regulation, and
7 we've just scratched -- now, since we met this morning,
8 we've just talked about departmental independence. Is
9 that the reference you're at, Michael? (C)(5) is only
10 in the regulation.

11 MICHAEL CURRY: Okay. Sure. You are correct.
12 There was an error in the first -- in the reg reference.

13 KATHI HAMEL: Is it the reg or the guidance?
14 Because the guidance under supervision, there is no 5
15 either, so --

16 DANIEL LITTLE: We addressed this agent issue
17 so many times, and I think we're comfortable with that.

18 MICHAEL CURRY: Great. Okay. Proceeding on.

19 ROBERT FISHER: Kathi, can you use the mike
20 when you talk? Thanks. Only one mike at a time.

21 JOHN MAGEE: Dan, I need you to clarify. You
22 just stated that we've gone over the "agent" a number of
23 times, and you're comfortable with the language or the
24 definition? Could you clarify that for me?

25 DANIEL LITTLE: That's a good point to

1 clarify. I'm comfortable that we've gone over it
2 enough. Okay.

3 JOHN MAGEE: Meaning what?

4 DANIEL LITTLE: Meaning that we've discussed
5 the definition of agent and its use in this capacity.
6 So are you asking if I'm comfortable with, and I'm in
7 agreement that the definition of agent is sufficient and
8 it's something that I agree with and we should use
9 because that's not what I'm saying. We're saying I'm
10 comfortable we discussed it enough.

11 THOMAS WILSON: So we don't need to discuss
12 this question?

13 DANIEL LITTLE: Yes. We're going to move on.

14 ROBERT FISHER: The definition is up on the
15 screen, so just for your purposes, Mike, so you know
16 where we are.

17 JOHN MAGEE: A clarification. You're
18 comfortable that we've gone over the definition a number
19 of times but you're not comfortable as it being included
20 in the document? Or can you elaborate that a little
21 clearer for me?

22 DANIEL LITTLE: The purpose of this is to
23 gather information from the committee through
24 discussions, your questions, or through the
25 recommendations that you'll be submitting.

1 I'm only one member of three on the commission
2 that will be making a decision, so I can't say, you
3 know, this is what we're going to use, this is what
4 we're going to agree to or not, so I'm comfortable that
5 we discussed the term "agent" enough for our purposes to
6 take it back and be able to make a decision.

7 JOHN MAGEE: Okay. Thank you.

8 ROBERT FISHER: Okay. So then the next
9 guidance question is also on page 15 under that heading,
10 NIGC question.

11 MICHAEL CURRY: All right. Middle of the page
12 on page 15 of 19, NIGC question regarding -- again,
13 along the lines of agent, since the definition of the
14 word "agent" permits the use of computer applications to
15 perform the functions of an agent, what are the steps
16 required to demonstrate and verify said agent's
17 independence from your -- here's the long IT converted
18 title here -- security and management of server, server
19 software and data associated with Class II gaming?

20 So, simply, the question -- the portion of the
21 question in the middle, what are the steps required to
22 demonstrate and verify said agent's independence,
23 basically that's almost pretty much a testing question.
24 How do you test that? How can you verify that? What
25 would be the -- I guess the test that that control would

1 go up against and say, yes, the objective of that
2 control is being satisfied?

3 ROBERT FISHER: Do you mean how will they
4 accomplish it or --

5 MICHAEL CURRY: Well, no, not a step-by-step
6 process on how they would accomplish it. The question
7 is what are the steps required to demonstrate and verify
8 said agent's independence. So, again, it still falls
9 under the heading of testing. How would you verify
10 that? How would you say, yes, this control is being
11 met, this control is being satisfied, or this control is
12 being exceeded?

13 ROBERT FISHER: Okay. Kathi.

14 KATHI HAMEL: I believe at our guidance
15 documents we talked job descriptions, organizational
16 charts and reporting structures, and that's how you
17 verify it because there would be an org chart and job
18 descriptions that would be detailed enough to have
19 segregation of duties.

20 DANIEL LITTLE: Do you know where? In the
21 guidance, do you know where?

22 KATHI HAMEL: (D)(2) in the guidance document,
23 page three of nine.

24 MICHAEL CURRY: All right. Middle of page 16
25 of 19, NIGC question, this was provided to us from

1 Nimish: How does asking a manufacturer for permission
2 to deactivate services or permission for anything for
3 that matter conform to common gaming regulatory
4 practice? Could this provision raise concerns regarding
5 the Federal Government interfering via regulation with
6 the contract between tribe and vendor?

7 ROBERT FISHER: Kathi.

8 KATHI HAMEL: I think in the guidance document
9 we didn't use the word "permission," but it's a way to
10 communicate a process, and that's why the guidance
11 document says "must be consulted prior to the
12 deactivation." It doesn't say permission, but it's
13 encouraging that there's communication.

14 ROBERT FISHER: Consulting.

15 KATHI HAMEL: Here's what it says in the
16 guidance document, which is (g)(1) Romanette iv.

17 ROBERT FISHER: Top of page 16?

18 KATHI HAMEL: Yes. Unused services and
19 nonessential ports are disabled whenever possible. The
20 manufacturer/supplier of the system must be consulted
21 prior to the deactivation of any service or ports to
22 ensure that an essential server/port is not
23 inadvertently disabled.

24 ROBERT FISHER: So I guess I'm wondering
25 whether we're having a difference of how you're reading

1 the document and the intentions behind the document and
2 and whether or not -- because every time you raise a
3 question, they explain to you that it's covered in some
4 other way so far.

5 DANIEL LITTLE: Well, they're clarifying it,
6 which is helpful, because if you're not -- I mean, it's
7 helpful how they're clarifying it. It's good, you know,
8 we may say that there may be a better way of clarifying
9 that, and that's what I'm --

10 ROBERT FISHER: Okay. So it's all right, so
11 it's useful. Go on.

12 MIA TAHDOOAHNIPPAH: On page 15 (inaudible).

13 ROBERT FISHER: You have to mike it, Mia.

14 DANIEL LITTLE: We're comfortable with that.

15 MIA TAHDOOAHNIPPAH: It's in regards to this
16 one, right?

17 KATHI HAMEL: I'd like to make another
18 recommendation for the TAC. I believe it's an oversight
19 to the guidance documents for this section. Section C
20 talks about the variances in the guidance document, and
21 I don't believe this applies to this section.

22 ROBERT FISHER: So what's your suggestion?

23 KATHI HAMEL: That it be removed. It's on the
24 bottom of page two of nine. Oh, golly, it's not in the
25 NIGC document, it's in the TGWG document.

1 DANIEL LITTLE: It's under Tab J.

2 KATHI HAMEL: Yes, Tab J.

3 ROBERT FISHER: So give me the paragraph
4 reference again.

5 KATHI HAMEL: It's guidance document for
6 543.16(c), and it's titled "Variances."

7 ROBERT FISHER: Got it.

8 KATHI HAMEL: And I believe it should be
9 removed because it's not applicable to these sections.

10 ROBERT FISHER: Oh, I see. So you're
11 suggesting remove the whole thing.

12 KATHI HAMEL: The guidance document.

13 ROBERT FISHER: Right. Okay. Keep going.

14 MICHAEL CURRY: Middle of page 17 regarding
15 Section (h)(3)(ii) could be interpreted as password
16 changes can only be changed after every quarter at the
17 soonest. Is that the intent? If so, how does that fit
18 in with best practices?

19 ROBERT FISHER: (H)(3)(ii) starts with "Access.
20 Credential records should be maintained either manually
21 or by systems," and then it goes on.

22 Tom.

23 THOMAS WILSON: So it does, in fact, say that
24 at a minimum it's quarterly. So what I hear you saying
25 is that quarterly may not be sufficient according to

1 best practices.

2 MICHAEL CURRY: Well, best practices is
3 quarterly, but for the guidance to establish that you
4 can't change it any sooner than that. There's always
5 going to be an instance where maybe somebody loses their
6 password, someone else picks it up. You realize I can't
7 wait until the end of my quarter to change my password,
8 I need to change it now.

9 ROBERT FISHER: So I'm interjecting because
10 there are people down there saying that's not how
11 they're reading it.

12 So who wants to -- Matt, do you want to address
13 that? Matt or Kathi.

14 MATTHEW MORGAN: That's not at least what I
15 interpret the language to say. I mean, if you read it
16 verbatim, it says it should be changed at intervals
17 established but not less than quarterly. So it's giving
18 you a -- at the very least you have to change it
19 quarterly, but it doesn't say you have to wait until the
20 end of the quarter.

21 (Multiple speakers.)

22 MATTHEW MORGAN: That's my question. I did not
23 read it the way that you interpreted it.

24 DANIEL MCGHEE: I think to answer the question,
25 did he mean it to be -- so it means no less -- what he

1 said is what it means --

2 ROBERT FISHER: Right. So the intention is not
3 to make it quarterly. Right, it's a minimum.

4 DANIEL MCGHEE: It's at least quarterly.

5 MICHAEL CURRY: At least quarterly, I guess, if
6 nothing else; for clarification, if nothing else.

7 Okay. Next point, section (h)(7) and (8) do
8 not necessarily account for issues with role changes.
9 For example, if an employee has a role change from
10 regulatory to food and beverage, then the regulatory
11 access privileges should be changed immediately as well.
12 Should this be clarified?

13 ROBERT FISHER: Kathi.

14 KATHI HAMEL: I agree, but I would avoid using
15 the word "role changes" and maybe use a word like
16 "transfer." I think that the guidance document for all
17 the sections that talk about supervision segregation and
18 independence gives enough control for role changes:
19 Today I'm a cashier and tomorrow I sell bingo cards, but
20 it needs to have communication when someone transfers
21 from position cashier to being bingo sales.

22 ROBERT FISHER: So do you want to suggest a
23 change or a clarification, as they say, or not?

24 KATHI HAMEL: Maybe it says -- right now we're
25 just talking about terminations, so termination or

1 transfer? Is that clear enough?

2 DANIEL MCGHEE: The way I read it, it is
3 speaking about there's access credentials of terminated
4 users. I don't think of that necessarily being
5 terminated employees. It just means that they are no
6 longer using these standards, as what we call them,
7 users. So if you're terminating the user, you could
8 have been transferred, that's why your user privileges
9 have been terminated. I don't think it's meant to
10 be -- (inaudible). You know what I mean, you transfer
11 your credentials, your access has been terminated, not
12 necessarily meaning as an employee. I can always change
13 positions, but it could be clarified to be sure about
14 that.

15 DANIEL LITTLE: All right. We can clarify
16 that. I think there could be some confusion because I
17 also think that that was separated employees.

18 MICHAEL CURRY: Okay. Moving right along, at
19 the top of page 18 of 19, would adding a section to
20 ensure cross compliance with any 547 requirements
21 especially from recordkeeping requirements, such as ITL,
22 certification letter, TGRA approval letter, et cetera,
23 be beneficial?

24 THOMAS WILSON: What would you envision that
25 cross referencing to look like? In other words, what

1 certain components of the cross reference would you be
2 more concerned about than others that would need to be
3 cross referenced in here back to 547, if you have any
4 ideas?

5 MICHAEL CURRY: Sure. Well, because it brings
6 up, especially from recordkeeping requirements,
7 certification letters, approval letters.

8 DANIEL LITTLE: This is a question raised by
9 Nimish. We can probably clarify a little more of what
10 he meant. We'll try to submit that as a follow-up
11 question.

12 Anything you want to add, Rest?

13 MICHAEL CURRY: Okay. Moving on --

14 JOHN MAGEE: (Inaudible.)

15 ROBERT FISHER: The question was what does ITL
16 stand for. And it was Independent Testing Lab.

17 Okay. I know it's cumbersome, but we've got to
18 use the mikes in order to be able to hear.

19 Okay. Back to you, Mike.

20 MICHAEL CURRY: Okay. Middle of page 18, how
21 does TGRA operations verify the outcome of any downloads
22 that took place after remote access session has
23 concluded? Are there any other requirements that were
24 removed from Part 547 as a control that could or should
25 be placed here?

1 ROBERT FISHER: Kathi.

2 KATHI HAMEL: I think 547 has significant
3 regulation concerning verification of downloads through
4 signature verification. I reached out to our IT
5 department specifically about non-bingo servers and
6 receiving this type of information, the answer was their
7 best practice was, no, they would not receive
8 information via a download, that if there was something
9 that needed to be updated or changed especially on the
10 system it would be done via thumb drive or disks, that
11 the information can be validated.

12 So internally I would say that for our casino
13 best practices that we would not perform a download that
14 would require verification, but 547 talks about it,
15 which is different than the 547 regulation for bingo in
16 the game room, because there's signature verification
17 that comes from independent verification.

18 ROBERT FISHER: So is she getting at what you
19 asked?

20 MICHAEL CURRY: If I could clarify one point.
21 On the question itself, if the IT department effects a
22 download, let's say, for instance, they get off at
23 5:00 o'clock in the evening but they have the download
24 starting at 4:00 and it takes two hours for that
25 download to complete, during the regular work hours your

1 VPN, virtual private network, is open.

2 Your IT department, your slot department and
3 every other department is communicating with a vendor or
4 manufacturer over across that VPN, but at the end of the
5 day when that VPN is shut down or it's locked down and
6 there's still incoming downloads or perhaps a download
7 didn't complete yet -- it still needed to finish --
8 pretty much like when we download software on our own
9 computers or laptops at home, it takes a considerable
10 amount of time.

11 So the question was, how is the assurance of
12 that download complete pretty much after everybody has
13 gone home? Does it take that download, kick it back to
14 the sender and say, well, the port wasn't open? Or does
15 it reside in an after-hours file? Obviously you
16 wouldn't want something like that loaded into your
17 production environment after your IT department has
18 already gotten off work for the day. So will it reside
19 in a standby data file or e-mail box? Or will it,
20 again, get kicked back to the sender saying, hey, the
21 port's not open, you've got to try again tomorrow?

22 KATHI HAMEL: I guess in the real world our IT
23 department would not be allowed to go home if there was
24 a download in progress even if it required overtime. So
25 that's real life. How it gets written in regulation and

1 guidance documents, I mean, I guess you say best
2 practice is you stay there until it's done. So you do
3 segregate anything that's downloaded and you verify it
4 before you put it into production. And I'm sure all of
5 us can speak that you don't put anything in production
6 when your port is swamped, so you're not going to do
7 anything that hurts your business. So all of our
8 switches to dial into our systems are manually managed
9 by a person agent, not a system agent. It doesn't shut
10 off at 5:00 o'clock because there's a timer. So it's
11 managed by people.

12 THOMAS WILSON: Is your concern, if I
13 understand correctly, that if a download is in progress
14 and something happens to that download, who would know?

15 MICHAEL CURRY: Who would know? Would the
16 system pick up on that or would the system shut down
17 completely? Does it require human intervention?

18 And, again, it says after the remote access,
19 the session has concluded. So the open VPN, let's say
20 for instance, that you lock it down at 5 o'clock and
21 send everybody home, but like you just explained, if
22 there's still downloads coming in, maybe nobody goes
23 home until it's all done, maybe you have a system that
24 does monitor when the download is complete and it sends
25 out an e-mail saying downloaded successfully, let's move

1 on kind of thing.

2 So that was the gist of the question, how do we
3 verify that? How do you verify the outcome of a
4 download after the virtual private network session has
5 concluded? And it sounds like, from what I hear, it
6 wouldn't be concluded, you leave it open until the
7 download is complete, nobody goes home until it's done.

8 THOMAS WILSON: Well, casinos are 24/7
9 operations, so the idea that -- I mean, typically these
10 downloads kinds of things that you're talking about are
11 happening at times other than the normal business hours
12 because you're trying to schedule them around the least
13 busy period. I mean, I guess what I'm trying to
14 understand with the question is, is your concern that
15 there isn't specific steps that, say, somebody has to
16 physically verify the completion of the download? Is
17 that what the concern is?

18 MICHAEL CURRY: Well, more of the concern is
19 the open or the closing of the external network, the
20 VPN, or if there are no downloads coming through there,
21 no big deal, obviously.

22 But to manage the opening and closing and the
23 monitoring of that network, what would be in place to
24 accommodate any downloads that may even occur after
25 that? Like you said, even though it's a 24-hour

1 operation, the majority of the downloads are going to
2 occur in the evening, and in some cases -- I won't say
3 "some," in most case the downloads will actually occur
4 during the day, and the gaming operation, because
5 they're slower now, will go ahead and download.

6 It's like do you want to run this application
7 or do you want to save it? If it comes down during the
8 day, you want to save it and then during the evening
9 most folks will go ahead and run it or execute it.

10 THOMAS WILSON: I mean, these downloads that
11 you're referencing can only come in through remote
12 access. I mean, it's remote access. Remote access is
13 controlled by individuals. I don't know anybody that
14 has automated remote access. So there are controls even
15 in the remote access section out there that you're
16 talking about, who can get in when and for how long or
17 what happens.

18 I mean, this is a coordinated event. So it's
19 not like a Microsoft windows update, that if you turn on
20 your computer, in the background it goes and it's
21 performing an update and then asks you if you want to
22 install it. When somebody has access to your system,
23 it's because you have given them specific access to do
24 specific things at a specific time, and that's part of
25 this discussion with the manufacturer about, okay,

1 what's involved with this update, how long is it going
2 to take, what kind of resources do we have to have
3 available to do this, what should we expect happening as
4 a result of this update.

5 So I'm not sure that the concern that's being
6 voiced mimics the real day-to-day activities that take
7 place, because you're implying that -- almost like
8 somebody could gain or somebody could have access to the
9 system unattended.

10 MICHAEL CURRY: Not with this particular
11 control, no. No, that would be along passwords and user
12 authorization and firewall settings and things of that
13 nature that would be unintended. All this particular
14 question here was, after the network shuts down. And,
15 again, if this is not a relevant scenario, then we can
16 certainly press on and move on.

17 But since there are operations that aren't
18 24 hours a day and they still have communication traffic
19 over their VPN even though some folks have gone home for
20 the day, what happens to that traffic? Do they leave
21 their servers up and running and go ahead and grab their
22 car keys and leave for the day? Or do they shut the
23 servers down and anything that comes in after everyone
24 has left for the day gets kicked back with a message
25 attached to it saying, sorry, we can't accept anything

1 until business hours 8 o'clock to 5:00 tomorrow,
2 whatever the case might be.

3 It's just the after hours with the network
4 communication, what happens with that traffic?

5 ROBERT FISHER: Go ahead, Matt.

6 MATTHEW MORGAN: I think some of it is
7 relevant, depending on what type of product you're
8 talking about and some of it is relevant to what your
9 operation does. You know, servers in a Class II
10 environment, when you close at midnight, you don't walk
11 in and flip the power switch and everything goes down
12 for that day and then at 8 o'clock in the morning you
13 walk in and you flip everything back on. I think that's
14 part of the real world scenario, it doesn't work that
15 way, the server is on.

16 How you deal with information that comes
17 through, what are your procedures, is going to be a
18 little bit different depending on how you set up your
19 internal structure, you know, where IT resides, where
20 the credit people are supposed to check the verification
21 resides, how operations wants it to come through. But
22 most software packets that I see some come through, they
23 almost have to shake each other's hands at this point,
24 for the large part.

25 You know, you come in, the machine is saying, I

1 sent you something, did you get it? A server sends it
2 back and says, yes, I got it. If those handshakes don't
3 take place, then it doesn't happen. And that's outside
4 of the visible person coming in and running some type of
5 verification. So, again, I think to echo some of this
6 is, you know, some of it, I guess in our experience is
7 unrealistic, but a lot of that is, depending upon the
8 product, is how your operation wants to work.

9 If you get too specific, you're going to
10 exclude somebody from doing something and how they
11 operate, which was a big point, and what we're trying to
12 get away from here is not procedurally driven, we're
13 looking at the risk. Do you have controls that, you
14 know, on the guidance at (j)(2), controls must require
15 all remote access to be performed by a secured method.
16 What that secured method is is going to depend on your
17 operation.

18 When the TGRA comes in, they're going to check
19 that method, make sure they're comfortable with it. I'm
20 sure when your agents come in, they're going to check
21 that method and make sure they're comfortable with it.
22 If somewhere along the line someone's not comfortable,
23 it's going to promote discussion and set out and say
24 okay, guys, we don't think you're quite there, or you
25 know what, you don't have really the internal control

1 structure in place to conform with industry standards
2 and this is what you're going to need to do otherwise
3 you risk being in violation of whatever section that may
4 be.

5 ROBERT FISHER: Okay. Ready to move on to the
6 next question? Which, I believe, if I got it right, is
7 19, "There's nothing in the section to safeguard."

8 MICHAEL CURRY: All right. The middle of 19,
9 "There is nothing in this section to safeguard the
10 security of sensitive data that is backed up. How would
11 you ensure player tracking data, especially unencrypted
12 data that is sent via tape offsite, is protected?"

13 ROBERT FISHER: Tom.

14 THOMAS WILSON: In page nine of nine of the
15 guidance document, one of the things it talks about in
16 back up of data and storage of data is that backup data
17 files and -- (inaudible.)

18 ROBERT FISHER: Tom, is your mike on? Can you
19 get a little closer?

20 THOMAS WILSON: On page nine of the guidance
21 document in the middle of the page, No. 4, where it
22 talks about backup data files and disaster recovery
23 components should be managed with the same security and
24 access controls as the system for which they are
25 designed to support.

1 So I think inherent in that is that you are
2 applying the same level of control over the data whether
3 it's sitting here or over here. So if you're talking
4 about security of the data in terms of if it's sitting
5 on the backup mechanism, is that encrypted? That if
6 somebody were to gain access to that data at the vault
7 or wherever it happens to be, is that what you're
8 question is referring to? Or is it just saying that,
9 you know, because it's talking about specifically
10 unencrypted, that is sent via tap offsite is protected.

11 MICHAEL CURRY: It would be in reference to
12 the data on the tape as opposed to the tape itself
13 obviously. But you're correct, though, the security and
14 well-being encompasses the data and the tape, but we're
15 obviously more concerned about the data; we don't care
16 about the tape, we can replace the tape, but the data
17 itself -- ensure player tracking data.

18 Now, the question more so relates to is
19 encryption being utilized regardless of what the primary
20 production environment medium is? Granted, it's going
21 to be secured and encrypted on the server itself. But
22 let's say you take that data and now you want to
23 transfer it across state or just across town, does it
24 lose that encryption? Does it lose that security?

25 And you're absolutely right, referring back to

1 those sections, it says this element needs to -- or
2 entity needs to exhibit the same level of security of
3 any other component. But, again, from the bulk or the
4 gist of the inquiry, during the course of going from a
5 production environment to an archived environment or a
6 fire-safe environment, is that level of security
7 maintained from point a all the way to point b, is where
8 the question is generated from.

9 THOMAS WILSON: I can't answer that question in
10 terms of "is it," but I guess I'm questioning why that
11 is a regulatory concern, once data is leaving a facility
12 or -- I mean, our backup is onsite, offsite but still on
13 the property, so to speak, or whatever, but I'm just
14 trying to understand the regulatory concern at that
15 point, whether that data is encrypted or not encrypted.

16 MICHAEL CURRY: Or any other means, any other
17 secure means, going from that transport from the
18 production real world environment either being saved to
19 tape or a hard drive that night and then it's done, it's
20 no longer production data, it's going to be shipped
21 somewhere else, during that shipping process and during
22 that storage process, is it secure -- is it still
23 secure? And if it's not initially encrypted when it was
24 stored to tape, is it going to be encrypted?

25 THOMAS WILSON: But what if it's not?

1 ROBERT FISHER: Why is it important to you
2 that it be encrypted?

3 MICHAEL CURRY: Because anybody can take it,
4 plug it in, bring it up and social security numbers,
5 phone numbers, names, addresses, anything that's
6 sensitive key client information will be housed on your
7 data tapes.

8 THOMAS WILSON: I understand, but I guess what
9 I'm trying to get at is from a regulatory standpoint,
10 are you advocating that there has to be a regulation
11 that says -- the difference is that what you're saying
12 essentially is that this data must be encrypted versus a
13 business decision of we're going to encrypt it or we're
14 not going to encrypt it.

15 Putting the risk aside, I understand that the
16 risk of the data again in our facility we don't even
17 download onto -- we use secure encrypted USB drives
18 because we're so concerned about data when we walk out
19 of that casino back to our tribal gaming office that we
20 just don't have things unencrypted. But that being
21 said, that's a business decision that we make to do
22 that. I don't know that it would make sense that from a
23 regulatory standpoint there will be a regulation that
24 says all data has to be encrypted. The risk is on the
25 facility and the operator of the tribe, so that's where

1 I struggle with -- I understand the risk, I understand
2 what you're saying. Best practices would say yes to
3 those things, but I just struggle with at what point
4 does regulation end and best practices begin?

5 ROBERT FISHER: Okay. So there are other
6 people that have cards up. So let's do Matthew and then
7 Daniel.

8 MATTHEW MORGAN: Trying to go on with Tom, one,
9 we had the discussion, again, what level is appropriate?
10 You know, is this a federal minimal internal control
11 standard? And we're talking about encryption.

12 Well, that may be a best practice, there is a
13 question there in my mind, you know, what level is
14 appropriate to -- and it may just be a bad example, you
15 used an example of player tracking data, which a lot of
16 people have an issue with, but it makes a bad example,
17 and I understand where you're getting at that from.

18 But as businesses, we all make decisions that
19 affect our business and our credibility. Not every
20 decision the businesses make I'm onboard with because,
21 again, just like you guys, I have limited jurisdiction
22 over things. There are certain matters that are in my
23 purview and there's other matters that are not. While I
24 can have discussions with the businesses, ultimately
25 it's their decision on how they do stuff, and is that a

1 best practice. Like at Tom's place, he says they do it
2 because the decide they want to.

3 My question to you at NIGC, do you encrypt all
4 your data that comes up, I mean, all your information is
5 secured? Because I know we've had this conversation
6 before on an IT area, do you guys as as an agency
7 struggle trying to modernize everything and make sure?
8 I mean, are you at that point? And if you're not at
9 that point, what struggles have you focused on
10 internally or came through and trying to get to that
11 point? Because while it's a good goal to have required
12 as a minimum is sometimes difficult.

13 You know, you have to get your -- first of all,
14 you've got to have the money to do it. Second of all,
15 you have to have some expertise on your staff to be able
16 to do it and you've got to have some document control
17 around. So I mean all those, time, effort, money, you
18 know, it's a big list. So where is that line you're
19 drawing there?

20 ROBERT FISHER: Daniel.

21 DANIEL MCGHEE: I think this control issue is
22 just about protecting the data, and this is one way to
23 do it. You can take it off site physically store it
24 make it secure, or you can encrypt it so it's just a
25 matter of picking which one you would do. One is a

1 little harder and more expensive than the other. This
2 at a minimum if you can't afford to encrypt it, just put
3 it somewhere, lock it up, make sure nobody can get it,
4 get access to it. And that's all this is telling you
5 how to do. But the idea is to protect the data that's
6 on the tape.

7 ROBERT FISHER: Okay. Back to you, Mike, if
8 there's anything else that you're thinking about this.

9 MICHAEL CURRY: No, I'm good, I think we're
10 good.

11 ROBERT FISHER: Okay. Kathi.

12 KATHI HAMEL: Just another suggestion on the
13 guidance piece of this section. There's an M for audit
14 and accounting. I don't know how it applies here, so I
15 would recommend that it come off.

16 ROBERT FISHER: Recommend what? I'm sorry.

17 KATHI HAMEL: The guidance document M, Tab J,
18 page 99.

19 ROBERT FISHER: Yes. So what's your
20 suggestion?

21 KATHI HAMEL: Remove M.

22 DANIEL MCGHEE: The whole section?

23 DANIEL LITTLE: Yes.

24 DANIEL MCGHEE: It talks about servers, server
25 software and data.

1 ROBERT FISHER: So are you suggesting that it's
2 redundant to what's in the accounting and auditing?

3 KATHI HAMEL: They don't apply.

4 ROBERT FISHER: You don't think it applies?

5 KATHI HAMEL: No.

6 ROBERT FISHER: Okay. Anybody share that view
7 or have a different view around the table?

8 Matthew.

9 MATTHEW MORGAN: I'm just trying to read it,
10 trying to see -- so it's not that you think it's
11 redundant, you just think it's totally misplaced, is my
12 understanding?

13 (No audible response.)

14 MATTHEW MORGAN: Okay. Thanks.

15 ROBERT FISHER: Unnecessary, if I understood
16 correctly.

17 MATTHEW MORGAN: I think the reason why it was
18 in here is that the Tribal Gaming Work Group thought
19 that you would have software, server software or
20 software -- when you're dealing with audit and
21 accounting, you almost use it like a pointer. You're in
22 the IT, but if you're dealing with IT and they talk
23 about audit and accounting, you really need to go to
24 audit and accounting. Now whether it's needed or
25 whether that's correct or not, I don't really have a

1 thought on it, but I look at it more as almost a
2 pointer, go look here type of reference.

3 ROBERT FISHER: Okay. Tom.

4 THOMAS WILSON: Just one quick thing because I
5 think it's important to point this out. When we have
6 these discussions about controls, and I don't want you
7 to have the impression that I personally or anybody
8 speaking for the TAC, that because we don't think that a
9 certain piece of something should exist in a regulation
10 means that it's not an important point or important
11 thing.

12 And this gets to this concept of guidance, you
13 know, publications, things like this, educating people.
14 The issue is how much can you put in a regulation for
15 the sake of trying to cover all the bases versus saying,
16 you know, here's a document that talks about how you
17 can -- here are the kinds of risks that you should be
18 aware of, so for example, data integrity, data
19 encryption, why you encrypt these kinds of things.

20 I don't think anybody's disagreeing that those
21 things aren't important. It's just where do you talk
22 about those things versus other things. And
23 historically, the regulations have been used as both a
24 training tool, a process tool, a step-by-step tool, all
25 of these things. And what we're trying to advocate is

1 that the regulation needs to have the flexibility, and
2 in order to have the flexibility, it can't be so
3 specific that when you decide that -- in a regulation
4 you put in that let's say everything has to be 126-bit
5 encryption but three years down the road we now have
6 546-bit encryption and everybody goes, well, that's the
7 same or that's written in a regulation, you have to go
8 through a monumental exercise to try and change that.

9 So the approach that we're trying to advocate
10 is that industry tends to take care of itself in these
11 regards. We have all reputational risks, things of this
12 nature, that if we lost our data or people's social
13 security numbers were compromised, just like what we see
14 happening now, those things, the tribe is going to have
15 to deal with those issues.

16 But it doesn't mean that encryption today is
17 what the solution is tomorrow, because I don't know what
18 technology tomorrow is going to hold that might be
19 better than encryption or something else that we're
20 using. So I think there's an educational component that
21 needs to be addressed, but not through regulation, if
22 that's a fair statement.

23 MICHAEL CURRY: Very fair statement, very fair
24 statement. And if I can just ride on your last point
25 there, was the terminology. That's the point I was

1 trying to drive home earlier. By using the term
2 "server" up there, because what's applicable today,
3 what's called a server today, may not be what's relevant
4 in a reg three, four years down the road, this talks
5 about servers. We don't use servers anymore, that's
6 something that was used four, five years ago. But
7 anyway, I just wanted to bring that up again.

8 From your initial statement, no, I'm not taking
9 any type of negative of feedback or offense or anything
10 of that nature. This is the realm in which we all work
11 in, so we're here to get it done, so, again, no, I
12 didn't take any of type of, again, negative in stating
13 that.

14 ROBERT FISHER: Daniel, your card's up.

15 DANIEL MCGHEE: As far as (m) -- and (m)(2)
16 being deleted, because it talks about actual paper and
17 stuff, but I think (m)(1) is just a reference being a
18 reference to say because earlier in the document you'll
19 be talking about physical control of servers and server
20 software including accounting, vouchers, because you
21 asked about accounting software and server stuff
22 earlier. So this is somewhere at least we touch on it
23 in a guidance document that says when you have a server
24 or anything such as that that has to do with audit an
25 accounting, one, you have to have controls in place, and

1 two, you need to make sure that it doesn't go against
2 anything that's located in the page in the accounting
3 section. So it's really just a reference that maybe
4 should stay there as far as (m)(1) goes. But I can see
5 (m)(2) being deleted because (m)(2), it just talks about
6 paper and a lockbox or something and I don't think
7 that -- but I can see the reference to (m)(1).

8 KATHI HAMEL: No comment. I'm good.

9 ROBERT FISHER: All right. So anything more
10 on 543.16 regulation or guidance before we kind of check
11 back and see what you want to do? Anybody else have
12 anything?

13 (No audible response.)

14 ROBERT FISHER: So you're done with your
15 questions on the NIGC side, both on the regulation and
16 on the guidance. We've talked through all of those
17 questions. We've had some additional suggestions. So
18 do you want to test where you are with respect to this
19 section and close it out, or is there more to do here?
20 That's the process we've been using. Do you want to
21 keep following that same process?

22 DANIEL MCGHEE: I think earlier we talked about
23 now would be the opportunity if there was anything not
24 covered for the individual tribes to address if they
25 have anything.

1 ROBERT FISHER: Right. So anybody have
2 anything else that wasn't covered in one of the NIGC
3 questions?

4 (No audible response.)

5 DANIEL MCGHEE: Let's close it out.

6 ROBERT FISHER: Everybody hear that? So let's
7 test where we are here. So the first three up on the
8 screen are changes to the regulation, and then the next
9 four are the suggestions with respect to changes in the
10 guidance. So do you want to test the whole thing or
11 separate the regulation from the guidance? Separate it?
12 Okay.

13 So let's try it this way. So our practice is
14 to basically ask the committee if they support this
15 recommendation and then if that does not achieve full
16 consensus to then go through and figure out who is
17 willing to stand aside or who is opposed, and then if
18 they're opposed, to try and see if we can work it out
19 before we cycle back a couple of times. So that's our
20 process.

21 CHRISTINIA THOMAS: Just for clarification,
22 we're going to be deleting after "including" for (c)(5),
23 and number two shall have "unauthorized" for (c)(5) as
24 part of (inaudible) that wouldn't even exist.

25 ROBERT FISHER: You are absolutely correct.

1 So you can either do two or -- but it sounds like people
2 were general in agreement with that, so let's try it
3 this way. (Editing document on screen.) Because that
4 provision in (c)(5) wouldn't exist if you get rid of it,
5 by number three, if that makes sense.

6 Okay. So let's test the numbers 1, 2, and 3 up
7 there, the changes to the regulations. If you support
8 that recommendation, raise your hand.

9 Okay. That did not get everybody. So if you
10 are willing to stand aside, raise your hand.

11 That got everybody.

12 MIA TAHDOOAHNIPPAH: But you're missing
13 changing the word "personnel" to "agent." You don't
14 have that up in regulation change.

15 ROBERT FISHER: You know, you're right. I did
16 it up there but I didn't carry it over. Thank you, Mia.

17 Okay. We've got to test it again. So now I
18 guess we could test that change since we've got -- 1
19 through 3 is good. So if you support changing the word
20 "personnel" to "agent" in (d), right there, raise your
21 hand.

22 Okay. If you're willing to stand aside, raise
23 your hand, please.

24 Okay. So that did not get everybody -- now it
25 got everybody. Thanks for poking him with the elbow

1 there.

2 All right. So then let's look at the proposed
3 changes to the guidance. So why don't we just check it
4 out, see if we can do it as a group, 5, 6, 7 and 8. So
5 if you support those recommendations, raise your hand,
6 please. (H)(3)(ii).

7 Okay. So that did not get everybody. So those
8 of you who did not indicate that you supported these
9 recommendations, please raise your hand if you're
10 willing to stand aside.

11 Okay. So that still didn't get everybody. So
12 those of you that did not say either yes or be willing
13 to stand aside, what's going on with this? I'm sorry.
14 Go ahead, Mia.

15 MIA TAHDOOAHNIPPAH: No, I raised my hand.

16 ROBERT FISHER: You did. Okay. All right, so
17 I might be miscounting here.

18 THOMAS WILSON: Can we call for a vote again?
19 I think there's confusion amongst my colleagues.

20 ROBERT FISHER: And there's confusion up here
21 too because I thought we still had people that were
22 open.

23 Okay. So if you support the recommendations up
24 on the screen, 5, 6, 7, 8, the changes to the guidance,
25 raise your hand.

1 So if you're willing to stand aside, please
2 raise your hand.

3 Okay. That got everybody okay. So then it is
4 done.

5 Okay. So we are at 2:20 p.m. We've now closed
6 out 543.16, we're ready to move to the next thing on our
7 agenda, which is 543.23, and in case you didn't notice
8 this, the cookies are starting to appear in the room.
9 So maybe we should take like a five-minute stretch break
10 and give people a chance to get up and get some cookies,
11 so by my clock we'll realistically start at 2:30.

12 (Recess.)

13 ROBERT FISHER: So we're now going to move to
14 the surveillance section, which is Section 543.23, and
15 so we need somebody from the the TGWG to give us a quick
16 overview of this section, if you would.

17 ROBIN LASH: One of the big changes in
18 surveillance is the fact that Tier A, B, C are all
19 addressed in one section. That I think is going to be
20 real helpful for the new document to not have the areas
21 broken out instead just altogether in one area that just
22 addresses the different tiers in the same document.
23 That's all I have.

24 DANIEL MCGHEE: I think what we do is we
25 noticed when we were comparing the documents (inaudible)

1 that there was very little differences in the Tier A,
2 Tier B, Tier C requirements except for maybe one area
3 that may have required two and one requires three. So
4 with the group, there were people in the Tier A status
5 and Tier B so we would either decide was three truly
6 necessary or just something that could be done to make
7 it just one, you know, or we made accommodations or
8 compromises to try to have a simpler document too that
9 would -- so that's the biggest change, and then the
10 basic one about streaming things down, we've all
11 identified. But there wasn't a whole lot actually when
12 you actually looked at all three of them, there's not a
13 lot of difference.

14 ROBERT FISHER: Okay. So are you ready to turn
15 to the NIGC questions?

16 ROBERT FISHER: So, Daniel, can you click off
17 then let's go to Tom, then I will come back up to you,
18 Mike.

19 THOMAS WILSON: Because the format of this is a
20 little bit different in that you guys have lengthy
21 comments on the surveillance section, besides your
22 questions there's lengthy comments in here about things
23 that are missing or weak or nonexistent. I need to
24 address that as I went through the majority of your
25 comments, not in blue but the other comments in there, I

1 was able to find in the guidance documents the answers
2 to many of those questions.

3 So, again, it raises the concern for me that
4 when this was being reviewed, it was being reviewed and
5 these comments made in context of the guidance document
6 either was not looked at or wasn't even in the picture,
7 because I probably have ten examples that I can point to
8 right now where the specific question raised by NIGC, or
9 the comment, is addressed in the guidance document. So
10 I'm still struggling with this -- getting past this
11 thing that had, in fact, the guidance documents been
12 read in context to these comments because I keep
13 circling back that somebody isn't getting it.

14 So it's just a general observation, but we're
15 going to run into this on everything, that we go back to
16 the guidance document. And I don't have an issue of
17 pointing out to you where those things are at, but I
18 guess I would just appreciate that -- the implication is
19 that if they weren't looked at or something and, you
20 know, why are these questions still here, so just an
21 observation.

22 DANIEL LITTLE: Tom, many of the areas we're
23 just not clear, and if it's an area we want to address
24 in the guidance may be to clarify it. Like I said a
25 number of times, we're tasked with the objective of

1 creating a regulation for a very diverse industry, and
2 what makes sense to you may not make sense to others,
3 and that it's upon us to make sure that these guidance
4 documents are as clear as possible, so there's that
5 point.

6 The second point is some of these comparisons
7 were done prior to the Tribal Gaming Working Group
8 sending us the guidance document. So I don't want to
9 say we haven't gone back and looked at them, but it
10 wasn't a very easy job of creating this comparison
11 document. This is quite difficult. And I know, you
12 know, our general counsel's office spent many, many
13 hours putting these together. So, you know, this is not
14 to try to make excuses or anything, but this is in
15 addition to regular functions of what the staff is
16 doing, servicing the tribes and their regions and
17 conducting audits and doing everything else, doing this
18 in addition to that.

19 So they're pretty complex, and the way that our
20 folks look at these may not be through the same kind of
21 prism or the view that you have. So it's important for
22 us to make sure that we're as clear as possible to
23 understand what the group meant when they wrote these
24 guidance documents.

25 THOMAS WILSON: Just to to be clear, Dan, it's

1 not the interpretational things I have issues with, it's
2 when there are things here that, for example, possible
3 requirement of backup generator or loss of power isn't
4 addressed. Well, it is addressed in the guidance
5 documents. No requirement to document training, but
6 that is addressed in the guidance document. No required
7 coverage of bingo game boards, but that is addressed in
8 the guidance document.

9 So I'm talking about just these one-on-one
10 comparisons where it's in the guidance document, the
11 statement is here is that it doesn't exist. I
12 understand these comments were made prior to having the
13 guidance documents then, yes, they're perfectly valid
14 because they certainly did not exist at that time.

15 So it's just an observation. I just want to be
16 clear that there is a lot of stuff in the guidance
17 documents and, you know, I'm certainly prepared to
18 address each one of these comments to point out where
19 that now exists if there's ambiguity in NIGC's mind
20 about is that issue even addressed or not.

21 DANIEL LITTLE: We're just going over the ones
22 with questions we have in blue.

23 THOMAS WILSON: You have the questions in blue,
24 but there's all this -- there's more commentary on
25 surveillance, in what I've seen today as far as

1 commentary. So in my mind that indicates that you guys
2 have a lot of concerns about surveillance and what is or
3 isn't, and it's important for me to know that you guys
4 understand that these risks that you're identifying in
5 your commentary have, in fact, been identified in the
6 guidance document.

7 That's what I need to make sure that you
8 understand, not just your questions in blue because
9 there's only three or four of those but there's pages of
10 commentary in general about the whole surveillance
11 section.

12 ROBERT FISHER: Well, so how about if we start
13 with the questions in blue and then see if there's
14 additional things that we may want to take up. So how
15 about if we go to Mike.

16 MICHAEL CURRY: All right. Thank you.

17 ROBERT FISHER: What is the first question?

18 MICHAEL CURRY: Okay. Page 4 of 17 under the
19 minimum control standards for surveillance. The point
20 was brought up there's no guidance in either the 2010
21 version or the working group version for cross
22 referencing IT requirements. For example, what are the
23 requirements for vendor or vendor agent remote access to
24 surveillance systems for troubleshooting purposes? Can
25 vendor or vendor agent access be segregated from real

1 time recording or any stored contents? What about the
2 instance (inaudible) of response requirements and vendor
3 responsibilities towards incident response.

4 ROBERT FISHER: Christinia.

5 CHRISTINIA THOMAS: I will actually agree there
6 isn't anything in here drafted that would say that
7 anybody that has access, remote access to the
8 surveillance system has to (inaudible) the remote end,
9 it probably should have that covered as part of
10 regulation.

11 ROBERT FISHER: Kathi.

12 KATHI HAMEL: I think the server, server
13 software section covers that, and I believe it would be
14 a function of those departments, and it does very
15 clearly explain about the remote access.

16 ROBERT FISHER: In what we just looked at,
17 543.16?

18 KATHI HAMEL: Yes.

19 ROBERT FISHER: Okay. Can you sort of see it
20 or not?

21 Christinia.

22 CHRISTINIA THOMAS: Surveillance departments
23 and where they're located at, there is you know
24 surveillance department that's actually a part of the
25 Gaming Commission. We're looking at these regulations

1 so like a server still there's not an operation and the
2 controls that we want in place for operations, but if
3 surveillance resides as part of the Gaming Commission,
4 are you going to also hold them to a regulation that
5 you're holding to a property?

6 DANIEL MCGHEE: As far as the question, a
7 regulation is a regulation whether it's Tribal Gaming
8 Commission follows it or the operations follows it. So
9 all parties involved has to follow it. So if
10 surveillance is part of the Gaming Commission, they
11 still have to follow the same regulation that would have
12 been for the operations. Now as far as whether or not
13 the remote access of the server section applies here, I
14 haven't had time to wrap my head around that one.

15 ROBERT FISHER: Okay. Any other comments or
16 suggestions in response to this question? So
17 Christinia, given what you said, do we need to look at
18 543.16, or what do you think?

19 CHRISTINIA THOMAS: I actually heard it was
20 regulation that's applicable to the gaming commission as
21 it is to the property. I don't think the language in
22 16, the way it's written, covers the surveillance system
23 in regards to the controls that should be in place when
24 they're remoting into that particular system.

25 ROBERT FISHER: Okay. So would it be better

1 to go back to 543.16 and look at how you might change it
2 or broaden it to encompass that? Or is it something
3 that you would look, in this section, to do?

4 CHRISTINIA THOMAS: I would do it in this
5 section and just reference that area as a requirement
6 for surveillance to follow.

7 ROBERT FISHER: Okay. So just before we move
8 off of that, just hold on. How might we do that? So
9 you would reference in here what should I write down as
10 the shorthand for us to figure out what the way to do it
11 would be? Okay. Does that get it?

12 (Indicating on overhead display.)

13 At least enough -- right. So we can come back
14 to that and figure out how to do it. I needed a
15 placeholder to do that and then we can move on. So be
16 thinking about how we might be able to put something in
17 there that would accomplish that.

18 Okay. Anything more on these? Because we will
19 come back to this one. Are you ready to move to the
20 next question?

21 Go ahead, Mike.

22 MICHAEL CURRY: This next point, it was an item
23 in blue. It can be found on page 4 of 17. It's after
24 bullet point -- or the numerical bullet point of number
25 4. The paragraph below that starting at the

1 "simplification of the surveillance standard." The
2 second sentence in that paragraph, "Eliminating the
3 definition of sufficient clarity and the lack of
4 specificity, including in the working group proposed
5 standards, results in ambiguity and does not provide the
6 tribe with minimum guidelines that are standard
7 throughout the gaming industry."

8 So to redefine that sentence into laymen's
9 terms, what was in the reg previously was a visual,
10 defining standard that says, okay, if you're going to
11 have surveillance, it has to meet this level of clarity,
12 you have to be able to see it.

13 Just to bring up an example, a few weeks ago I
14 was asked to provide some information on a robbery that
15 took place, and my view was, well, did you watch the
16 video? Did you watch the surveillance? They said, yes,
17 we watched the surveillance but it's so grainy and so
18 outdated that we really can't determine who was in that
19 video.

20 So to bring that up to date to what we have
21 here, yes, surveillance is necessary and it's a
22 requirement, but the lack of clarity standards allows a
23 gaming operation that perhaps doesn't have the revenue
24 or the resources available to it to perhaps go out and
25 purchase a new surveillance system off the shelf from a

1 pawn shop or something. It has to meet a level of that
2 if any incident does take place or suspectedly takes
3 place, that people, fine details can be identified,
4 faces can be identified, jewelry items, being able to
5 read the license plate on a car, things of that nature.
6 So I feel that that's lacking currently here now and it
7 should be placed back in again.

8 THOMAS WILSON: Well, when you talk about
9 sufficient clarity, because this is a broad term and
10 when you're trying to define for cameras, are we talking
11 about a certain resolution that these cameras must be
12 able to display, you know, as far as their image
13 quality?

14 We deal with this all the time. Even good
15 cameras go bad, and there's image issues, but it's very
16 expensive if all cameras have to meet this same
17 standard, if you will. So, for example, when you talk
18 about being able to read the license plate on a car,
19 sometimes we can; sometimes we can't, depending upon the
20 camera, the distance from the camera, the parking lot,
21 the lighting, is it daytime, nighttime, whatever.

22 In order for us to have a system, let's say in
23 the parking lot, and we do have camera coverage there,
24 but they can read to that level of detail, is it --
25 under our compact we have to have camera surveillance in

1 all the public areas including the parking lot. But
2 it's not that we have to have it to such a level of
3 sufficiency to be able the read a license plate. Now,
4 sometimes we can; other times we can't.

5 So when we talk about sufficient clarity, I
6 guess the concern that I have is does that vary from
7 individual to individual? So, for example, if we have a
8 camera that gives broad coverage of something, but if
9 you say sufficient clarity, as the unit has to see x, y
10 and z, that's different than -- you see what I'm saying?
11 You may meet the pixel requirement, but different
12 cameras are designed -- are put in areas to either
13 overview or see specific activity that you're wanting to
14 look at.

15 Now, certainly for cameras that are designated
16 cameras for a particular purpose should have a level of
17 clarity that they can identify. So, for example, in the
18 vault or whatever, you're counting and you want to be
19 able to see the denominations or what bills these are,
20 that make sense, but that same level of clarity may not
21 be necessary for a general overview camera that isn't
22 designed to hone in on any specific thing, it's just
23 providing the general overview of the particular area.

24 So the problem then becomes when you talk about
25 terms like sufficient clarity, is sufficient clarity for

1 what? For the purpose that that camera is there for,
2 which varies from camera to camera, or are we talking
3 about that this camera has to be a 10-pixel camera
4 that -- do you see what I'm saying? That's where I
5 would have concerns about this term sufficient clarity.

6 I'm not sure that the term sufficient clarity
7 actually -- this is a pun -- clarifies anything for
8 people when they're trying to determine what it is that
9 you mean by that. I can buy a camera that meets a
10 certain technical requirement. I can buy monitors to
11 meet a certain technical requirement, but what you're
12 really talking about is what that camera is seeing and
13 what it's able to see. And what I am saying is that
14 that differs from camera to camera and what it's
15 intended to do.

16 So, for example, it would be very costly at our
17 property to put in PTZ, handheld zoom cameras, which can
18 give me the level of clarity that I need for certain
19 things but they're the most expensive camera in my
20 makeup of cameras, and if all the cameras were PTZs, I
21 would get to the sufficient clarity that I think you're
22 alluding to but the cost far outweighs any benefit that
23 that's going to have in having those type of cameras
24 throughout the entire facility. But those type of
25 cameras are appropriate for certain types of activity

1 within the casino where I need that level of detail, if
2 you will. But I don't need that level of detail in all
3 of my cameras in the facility.

4 So just a general observation about about what
5 we talked about. These terms like that, the Tribal
6 Gaming Working Group sort of addressed that a little bit
7 in one of their documents where they talk about that if
8 a machine can produce certain kinds of reports and
9 reconciliations, so let's say you have a player dispute,
10 you might not have a camera that can give you sufficient
11 detail to show you the pay line, but the reality is
12 you're not paying off the pay line anyhow, you're paying
13 off what the system is telling you occurred in that
14 event.

15 So what the Tribal Gaming Working Group is
16 saying is that for those machines that have -- that can
17 independently verify what happened by virtue of the
18 machine, then having a dedicated PTZ camera or one that
19 provides this absolute level of clarity really isn't
20 necessary for that type of event. But if a machine
21 cannot produce that type of documentation, then you do
22 need a camera with a specific level of clarity to see
23 exactly what's going on.

24 The only benefit a camera on that machine --
25 one benefit that it provides is that if there is a

1 patron dispute, it gives the regulator, or whoever is
2 going to ultimately resolve that, the ability to see
3 what the patron saw at the time; even though we don't
4 pay off of what you see, it's what's going on inside the
5 machine.

6 So, you know, when we talk about cameras again,
7 it's just understanding that not all cameras are created
8 equal nor should they be, and when you use a term like
9 sufficient clarity, it implies that every camera has to
10 meet this standard that might not be applicable to draw,
11 all cameras are equal.

12 CHRISTINIA THOMAS: I want to say I agree with
13 Tom in the fact that cameras are all different. My
14 understanding of this regulation, how it's been written
15 before and how we've always interpreted it, is if
16 sufficient clarity were the cameras that are required by
17 IT standard, so the specific coverage that's required by
18 bingo has to have sufficient clarity. The parking lot,
19 that's covered in the regulation, so I would never
20 interpret that. Those cameras have to meet that same
21 level.

22 I have always interpreted the clarity based on
23 what's required as the standard, so every camera outside
24 of that, I've never measured against that clarity
25 provision. It's only been the cameras that have been

1 required that have standards that I viewed.

2 ROBERT FISHER: Okay. Mike, Daniel and then
3 Rest.

4 DANIEL MCGHEE: I think the focus on why
5 sufficient clarity, it was more important what you want
6 it to see, not if it had so many pixels or whatever. So
7 the standard should state a camera should be able to do
8 this, and if it was to see the denomination of money,
9 then whatever camera you've got to put in to be able to
10 do that is what you've got to do without dictating
11 certain pixels or so many frames per second, and so we
12 took that out and just focused -- more important is what
13 do you want to see with this camera and make that's what
14 was put in there. So then that way, if it was just a
15 general overview, then it has to be a camera that was
16 (inaudible) you can get a camera, but if it was one that
17 you had to be able to see the denomination, you would
18 say, you know, the camera, you would see the
19 denomination of it and let the facility shop around and
20 find that camera that could see it with that. What do
21 you want to see, and that's the kind of camera you'd
22 have, state it.

23 ROBERT FISHER: Rest.

24 REST WEST: I don't think the comment about
25 sufficient clarity for all the cameras, if you look at

1 the attachment that was sent by Robert the 542.23, it
2 denotes the cameras that the proposed standards asked
3 that there be, like bingo.

4 ROBERT FISHER: Where are you? What page are
5 you on?

6 REST WEST: Starting on page 18 is the
7 attachment that Mike Hoenig -- 543.23, it describes the
8 particular cameras that the draft regulations asked
9 that -- like for bingo surveillance system, ball draw
10 device by a dedicated camera with sufficient clarity, so
11 it denotes specific cameras and didn't, you know, say
12 all cameras in the casino in the parking lot have to
13 have sufficient clarity to provide a specific direction
14 as cameras should have sufficient clarity.

15 ROBERT FISHER: Does everybody see where Rest
16 is referring to in here?

17 No. So in the 543.23 document at the end, so
18 there's 17 pages on the actual comparison and then if
19 you look on page 1 it says, Due to the length of the
20 2010 draft regs, there's more pages attached and those
21 attached pages pull out the sections from the 2010
22 regulation. And so what Rest is referring to is the
23 reference in the first couple of pages to how the
24 sufficient clarity term is used with respect to bingo.
25 And in mine I didn't end up copying all them, I just

1 have the minimum surveillance standards for Tier A
2 gaming operations and --

3 MIA TAHDOOAHNIPPAH: Is this something you sent
4 in the --

5 ROBERT FISHER: It's parts of the comparison
6 documents that were sent two weeks ago. It was a little
7 confusing when you opened up the comparison document
8 because you couldn't quite figure out what this
9 attachment was for until you actually looked at the
10 document. So some of you may not have printed out that
11 part of it or thought that it wasn't -- which I
12 initially did -- that it wasn't a part of the comparison
13 document.

14 REST WEST: Well, you sent it as one document,
15 you sent it to the committee as one document, so it's
16 all --

17 ROBERT FISHER: I know. It's all in there.
18 It's just, what I'm saying, when I printed mine out I
19 couldn't quite figure out what it was. It took me a
20 little bit to figure it out.

21 THOMAS WILSON: You're talking about the
22 attachment that is a part of the same -- after you get
23 past page 17, then there's seven pages of documents that
24 you're talking about and then only those systems or
25 games identified in there are the areas that you're

1 referring to have to meet the standard.

2 REST WEST: That's my understanding at this
3 point. I'm going to have to go back to the --

4 ROBERT FISHER: Well, so the way it's written
5 in there is that it says -- if you look to see how the
6 term sufficient clarity is used in there, it's used in a
7 way that says the surveillance systems shall possess the
8 capability to monitor the bingo ball draw device or
9 random number generator/wager which shall be recorded
10 during the course of the draw by a dedicated camera with
11 sufficient clarity, there's the term, to identify the
12 balls drawn or numbers selected.

13 So what he's doing is trying to point out how
14 the term is being used. And there are various places in
15 this document where the term is used and it is tied to
16 the purpose for which you're doing the surveillance, if
17 I understand what Rest is saying.

18 So you're kind of in agreement with each other
19 about the purpose, but the definition did specify a
20 minimum level of technology, in essence, and what Daniel
21 said was they removed the specified technology reference
22 and said it had to be sufficient to meet the purpose
23 whatever the technology is that you used; right?

24 DANIEL MCGHEE: Yes. It would say for bingo,
25 for instance, it says with regard (reading from

1 document). . . Ball drawing device by a random number
2 generator which shall be recorded during the course of
3 the draw by a dedicated camera to identify the numbers
4 or designations drawn, which means it has to be able to
5 identify, what camera you're using, which number is
6 being drawn. So it says on there.

7 ROBERT FISHER: Do you see it now? It's now up
8 on the screen.

9 DANIEL MCGHEE: Then for the next one, it's
10 what's you're meaning to do.

11 ROBERT FISHER: So it's this part you're
12 referring to?

13 (Referring to overhead display.)

14 ROBERT FISHER: It's a different way to
15 accomplish the same thing.

16 REST WEST: And the intent of the committee you
17 know may met with some other digital surveillance
18 companies and stuff and they got the resolution you know
19 the old standard was 30 frames per second for your VCR
20 recordings and they incorporated standards in there and
21 came up with this CIF rate and whatever else.

22 ROBERT FISHER: It's up there on the screen. I
23 hauled it out.

24 REST WEST: So it's a minimum. And again if
25 you have to go court, it's probably what you need.

1 You're going to walk into court, some of the attorneys
2 are going to say if you walk in there with a bad tape,
3 they're probably not going to want to take you to court.

4 ROBERT FISHER: Okay. Kathi and then Jason.

5 KATHI HAMEL: Daniel, I think you brought up
6 the point that when the TGWG worked on this regulation
7 is we tried to write regulations that told the reader
8 what needed to be seen. Now, if you can't see it
9 clearly, it's a given you can't see it. So rather than
10 having, you know, dots per inch and sufficient clarity
11 and some standard that in time won't even apply because
12 they couldn't -- isn't even judged that way, we tried to
13 say this is what the camera needs to be able to see and
14 record.

15 ROBERT FISHER: Jason.

16 JASON RAMOS: I can agree with you, Kathi. But
17 I would also say that part of what you just had up
18 there, Robert, that's a pretty minimal industry
19 standard, and I think that while you're talking about
20 frame rate, 30 frames per second, I think the real issue
21 there is capture rate because you'll have some smaller
22 facilities who use multiplexing systems, you're only
23 capturing one every 30 seconds.

24 Now, is that sufficient clarity? I mean, one
25 of them you're talking about resolution and one of them

1 is talking about frame rate. I think capture rate is
2 kind of something that's left out of there.

3 ROBERT FISHER: Tom.

4 THOMAS WILSON: I would agree with that. I was
5 actually getting onboard with the way the term is being
6 used until I see now that there's a definition for that
7 term, and that definition creates problems for me.
8 Because, again, what I think all of us should be
9 interested in, as Kathi has said, you have to be able to
10 see certain things, and can you see those things.

11 When we do our surveillance audit or when we go
12 through our casino and look at our cameras, we're not
13 looking at whether it can do 30 frames per second or
14 whatever, what I'm looking for in realtime is can I see
15 what I need to see for what this camera is looking at.
16 If I can't, we need to correct it.

17 Now, if correcting it means that we have to buy
18 a super-duper camera that does 3,000 frames per second
19 or whatever, I don't know, I'm less concerned about
20 that. And I know that I want to be able to see what I
21 need to see and that that is maintained in a sufficient
22 way that I can pull those digital recordings back up and
23 the quality of those digital recordings is such that I
24 can still see what I need to see as if I were standing
25 there watching it myself.

1 So this is where, when you talk about a
2 standard like this and saying that the camera needs or
3 the sufficient clarity is this, there's really no
4 guarantee that that, in my mind, can give you sufficient
5 clarity. It may meet the standard, but I still -- I
6 need something more than that. So I think if you focus
7 on you have to be able to see the activity to whatever
8 level you describe that out, so, for example, if in the
9 cash count room the level that I need to see it is I
10 need to be able to see what denomination those bills are
11 that are be counted, spread out, well, that tells me the
12 level of clarity that I need. And I know that a certain
13 camera won't do it for me and a certain other type of
14 camera will.

15 Irrespective of whatever this definition says,
16 I'm looking at that finished product, here's what I need
17 to see, and it seems to me that that's what is important
18 in the regulations, is not the technical capability
19 threshold for the camera, but can it produce for you
20 what you want it to produce, and that will take care of
21 itself then. Because a 10-frame-per-second camera
22 probably can't do what I need it to do, so I'm going to
23 be buying whatever level of technology I need to
24 purchase to get me to that level of clarity.

25 Does that make sense?

1 ROBERT FISHER: So I do know, and I don't know
2 whether this is useful or not, but I did read ahead here
3 a little bit. So I know what the previous commission
4 said about this, and this comes out of 2010 draft
5 regulation on the NIGC Web site.

6 So there are a couple of comments in here along
7 the same lines as what's been raised right here, that
8 sufficient clarity doesn't get you sufficient clarity,
9 and then there's a comment right here that talks about
10 the specific 30 frames in 4 CIF. And, essentially, what
11 they say, down towards the bottom there, is it's a
12 minimum and you have to have something that identifies
13 what you need to identify no matter what it says.

14 So it sounds like that's what the TGWG was
15 trying to accomplish and what you did. So then the only
16 question is do you need to specify a minimum standard in
17 order to accomplish it or is it sufficient to be able to
18 say that it has to be able to record what it is that you
19 want it to record.

20 THOMAS WILSON: Well, again, I would just say
21 that there's nothing wrong with the term "sufficient
22 clarity" as a statement in a sentence to help the reader
23 understand that what you're looking at needs to be
24 sufficiently clear to see what we're saying you need to
25 see. It's when you throw in a definition attached to it

1 that says this is what that terms means, that's where it
2 create problems for me.

3 I personally have no issue with the term
4 "sufficient clarity" in the context of a sentence. I
5 have a problem with a definition of what sufficient
6 clarity is that's taken out of that context of just
7 using it in normal words. Like, if I asked you can you
8 see that with sufficient clarity, you and I both know
9 what that means.

10 I'm not asking you can you see that at 30
11 frames per second, blah, blah, blah. It's just 20/20
12 vision or whatever. If it takes me to have glasses to
13 see that, then that's what I've got to do; right? You
14 don't need glasses to see it and that's okay, it works
15 for you, so we do what we need to do. But I think it's
16 when you throw a definition to it that it muddies the
17 water, in my mind.

18 ROBERT FISHER: Okay. So what do other people
19 think?

20 DANIEL MCGHEE: I think our point has been
21 driven there pretty deep because I think it was -- a
22 question was asked and we provided clarification as to
23 why.

24 ROBERT FISHER: We would hope there be
25 sufficient clarity.

1 MIA TAHDOOAHNIPPAH: Joe brought up a good
2 point, that you can have all of the things for
3 sufficient clarity, but if your lenses are dirty, you
4 know, you don't have sufficient clarity, you know,
5 you're still need all of that sufficient information so
6 there's other aspects in it as well, or you have
7 something obstructing what it is, whether it's bingo, a
8 card value, or something. Lighting, you know, that's
9 another thing that we do have to deal with, is that we
10 have -- we see see that definition of sufficient
11 clarity, but lighting, sometimes the lighting creates
12 problems so that we're not allowed to see sufficiently.

13 ROBERT FISHER: Go ahead, Mike.

14 MICHAEL CURRY: When the reg was initially
15 written and put out, the gaming operations themselves
16 would ask, okay, well what do we really need? Again,
17 this was a few years ago that you did the cash cage and
18 the count room and areas like that that need to be
19 covered. But that was just kind of like a spin off
20 from, you know, the '70s and '80s.

21 Then, of course, when digital raised its head,
22 the question arose, okay, well, what do we need? What
23 do we need to go out and do? I can't afford to bring in
24 a contractor who is going to sell me his most expensive
25 items on the shelf. So NIGC said you guys help us out

1 to at least put some type of parameter on what it is we
2 need to be out there shopping for, what it is that we
3 need to be looking for.

4 So in our wisdom, we, going through the
5 different systems that are out on the market, came up or
6 at least uncovered what the minimum technical
7 requirement -- I know you don't like to dabble too much
8 in the technical aspects of that, but when you get a
9 call from a gaming operation that says, well, what do we
10 need to install, it's better to say, okay, it needs to
11 qualify by 30 CIF, things of that nature. That should
12 fulfill that responsibility. And then at that point
13 it's just a matter of going out and buying that off the
14 shelf, whatever that requirement was. There was no
15 investigation on their part.

16 This day and age, yes, the gentleman perfectly
17 explained lighting is better in some areas than in most
18 or there's more of a requirement, a more critical need
19 for it to have a dedicated camera, there are going to be
20 those different variations, obviously, within the
21 environment, but for those areas like we already covered
22 that need to be monitored, there is a minimum from a
23 technical standpoint.

24 And also some very good points were brought up
25 now, okay, who cares what the technical aspect is as

1 long as a playback, not so much the recording, but the
2 playback itself is legible. In an ideal world, I think
3 that sounds perfect. Regardless who reviews this
4 recording, they can see -- if they have 20-20 vision
5 they can look at this recording and be able to decipher
6 key components of that video, or sometimes audio, but
7 for the video itself.

8 But anyway, I don't want to beat it to death.

9 ROBERT FISHER: Well, it's coming back at you.
10 A card just went up so we've got Brian and then Jeff and
11 then Tom.

12 BRIAN CALLAGHAN: I think the NIGC just made a
13 really good point in that we should probably scale back
14 the regulation, make it not so specific, and have really
15 strong guidance documents, because if you write these
16 regulations with specificity, they're going to be out of
17 date tomorrow, and then if we have very strong guidance
18 documents, we can adopt and change those at will, the
19 NIGC can adopt this change at will, which, I think was
20 the impetus of what the Tribal Gaming Working Group did.

21 So I second your -- I think we're going to have
22 a consensus here that we're going to agree to NIGC that
23 we adopt the TGW -- and as we go along with the guidance
24 documents.

25 ROBERT FISHER: Well, we'll see.

1 Jeff.

2 JEFF WHEATLEY: I was going to say the
3 technical specifications sound like the perfect avenue
4 for a technical bulletin and then that can be reinstated
5 as the technology increases.

6 THOMAS WILSON: I just have to say that this
7 idea, you know, when you talk about, well, what do we do
8 if a tribe calls us. You don't have to have the answer
9 for everything, and there are a lot of resources out
10 there for people to get informed information above and
11 beyond saying, well, as long as it takes this technical
12 standard.

13 Because the problem with that is a tribe goes
14 out and buys it because NIGC said this is what our
15 system has to -- minimum requirement for our system.
16 You go out and buy it, you install it, and guess what,
17 it doesn't give you what you need. You guys even maybe
18 come out or (inaudible) comes out and says that's poor
19 quality, and I can't see it. And then the argument I'm
20 going to get is, well, but we bought the minimum
21 equipment that said it would work.

22 I just think that you're putting yourself in a
23 bad position when it comes to things like this. It's
24 much easier for, I would think, as a regulator to say
25 I'm not telling you the brand of camera you have to buy

1 or the capabilities of the camera. What I'm telling you
2 is that whatever you buy it has to be able to do this.
3 It has to be able to see this ball drop out of this
4 shoot and I need to be able to see the number on the
5 ball. That's easy then for me to regulate because I
6 don't have to compare technical standards. I just say,
7 you know what, it's either cutting it or it's not and
8 the operator has to purchase whatever equipment they
9 need to purchase in order to meet the standard, which is
10 you need to be able to see this particular activity in
11 this particular scenario or situation.

12 So, again, I think by setting yourselves up
13 saying that you have to be able to answer this question
14 for tribes -- I hate to say it but this is part of
15 sovereignty and self-governance and tribes have to take
16 responsibility and figure it out sometimes without
17 relying on somebody else always telling them as long as
18 you buy this piece of equipment you're fine type of a
19 thing.

20 And I know at my tribe that type of
21 conversation would go over very poorly, about the fact
22 that we would call anybody outside of our realm and ask
23 them, well, what do you think about what type of camera
24 should it or should it not be. There are certainly a
25 lot of entities and organizations and consultants to

1 people out there that are more qualified than you or I
2 or the NIGC to opine about what sort of surveillance
3 systems should be in a facility. So it seems to me that
4 you wouldn't even want to be in that particular position
5 because I can see it backfiring as well.

6 ROBERT FISHER: Okay. So I think that's the
7 end of the cards, so that was your last comment. Is
8 there anything more from the NIGC that you want to raise
9 in any way to the other things that you have listed in
10 the comparison document?

11 DANIEL LITTLE: No, we're good.

12 ROBERT FISHER: Okay. So then let's check to
13 see if -- sort of following the, if I remember the
14 procedure correctly, check to see if anybody has any
15 other questions that they want to raise besides what was
16 raised by NIGC.

17 And so that would be to Kathi.

18 KATHI HAMEL: Again, in the guidance document
19 we inadvertently put language in about variances and
20 accounting. So I want to discuss that.

21 ROBERT FISHER: You want to talk about that or
22 you're --

23 KATHI HAMEL: Well, I don't know what variances
24 existed in surveillance.

25 ROBERT FISHER: Which section?

1 KATHI HAMEL: Sections in the guidance document
2 (c) and then (k) is the audit and accounting and it has
3 the same language that we just discussed in IT, server
4 software.

5 ROBERT FISHER: So are you again proposing
6 that those be eliminated?

7 KATHI HAMEL: I think they both can come out,
8 but Daniel's opinion on one staying in, but records
9 forms and documents, I've never heard of them under
10 surveillance.

11 ROBERT FISHER: Okay. So Jeff do you want to
12 talk about this?

13 JEFF WHEATLEY: Not on this particular one.

14 ROBERT FISHER: Anybody want to talk about
15 either of the two sections that Kathi raised, the
16 variance section or the audit, which is section (k),
17 anybody have anything on that?

18 (No audible response.)

19 ROBERT FISHER: Okay. So then we'll just kind
20 of see what happens.

21 So, Jeff, do you have something new you're
22 going to talk about?

23 JEFF WHEATLEY: Something separate. In the reg
24 itself, section (c)(10), "The surveillance system
25 shall," number ii and iii seem to contradict themselves,

1 "including sufficient numbers of recording devices to
2 record the use of all cameras required by the section,"
3 and then iii says, "record all camera views."

4 I think "recording all camera views" is
5 overkill and could be rather cost-prohibitive for many
6 tribes.

7 ROBERT FISHER: So you mean right here.

8 (Indicating on overhead display.)

9 JEFF WHEATLEY: Yes. We certainly have many
10 more cameras than we have recording capabilities and we
11 don't record every single camera we have in (inaudible).

12 ROBERT FISHER: So does everybody see where we
13 are? We're in the regulation section (c), number 10,
14 and then the three little i's there.

15 Do you agree, Daniel?

16 DANIEL MCGHEE: Yes.

17 KATHI HAMEL: So is your question the intent it
18 may not say that but that you have to record what was
19 required by this section?

20 JEFF WHEATLEY: Right.

21 KATHI HAMEL: And you're saying don't record
22 everything required by the section?

23 JEFF WHEATLEY: No. I'm saying, ii says record
24 all cameras required by this section; iii says, "record
25 all cameras."

1 KATHI HAMEL: And the intent as required in ii.

2 JEFF WHEATLEY: I read it as needing to record
3 all camera views. If you just read 10 then iii that
4 would be cost prohibitive for my tribe. So I don't know
5 if that's confusing to anybody else.

6 ROBERT FISHER: Are you reading ii to say you
7 have to have cameras to get all the views and then iii
8 says you have to record all the views? Is that how you
9 read it?

10 DANIEL MCGHEE: (ii) is you have to record all
11 the required cameras.

12 JEFF WHEATLEY: Which I have no issue with
13 that, but then iii says you have to record all camera
14 views.

15 DANIEL MCGHEE: Required cameras, I used to
16 call them designated cameras rather than other cameras.
17 But now if you're talking about recording all camera
18 views in this section, it is saying exactly what you
19 said, because every camera that's in this section is a
20 required camera. So you're already saying record all
21 required camera views. Why then say record all camera
22 views again? Right? Am I --

23 CHRISTINIA THOMAS: I have a totally different
24 interpretation. For ii my understanding the way that I
25 read ii is the recording devices, so your DVRs, your

1 VCRs, you have to have enough of them to record the
2 required cameras. (iii) records the camera views, I
3 agree with you, but to clarify that it should read
4 "required camera view" that you're required -- it's two
5 different things. The ii is actually what it's
6 recording on, whether it's a DVR, VCR, and (iii) is the
7 actual cameras themselves. That's how I interpret it.

8 ROBERT FISHER: That's what you suggest for
9 the views?

10 And does that get at what you were saying,
11 Jeff?

12 JEFF WHEATLEY: Yes, as long as we don't have
13 to record every single camera.

14 ROBERT FISHER: Okay. Matt and then John.

15 MATTHEW MORGAN: I have a different question.
16 Maybe I missed this somewhere, but we went through and
17 you asked all the questions in blue that you had, but
18 there's lots of other comments in here in black that you
19 initially had. And then you said, well, we don't really
20 need to discuss those. Why? I don't understand why
21 your staff took the time to go through and make
22 comments, and there's lots a points in here. I know
23 some of them, you know, Tom talked about, but can you
24 provide us some explanation on why we're not addressing
25 some of those items?

1 DANIEL LITTLE: Like I said, I think some of
2 those might have been prior to getting the guidance
3 documents and we haven't gone through and pulled them
4 out, that would be helpful, to pull them out, but I
5 think for purposes of getting an understanding of areas
6 that need clarity, that this guidance were the ones we
7 really wanted to touch upon.

8 If there's areas that you think you want to
9 talk about, please, by all means, feel free to talk
10 about it if you'd like.

11 MATTHEW MORGAN: Not necessarily. It kind of
12 bought up this morning when Mr. DesRogiers asked some
13 questions. He was kind of saying well, I'm trying to
14 follow along and I want to see some documents and I'm
15 thinking that has you post these documents to the Web
16 site and you put out the general questions out here and
17 then if they actually do follow along and come back and
18 read the transcript and there's nothing in there that
19 addresses those questions, I'm just a general public
20 member, I haven't really followed along closely, there's
21 a lot of question marks I have there was that question
22 answered or was that covered or what did you call out on
23 that subject. And then you're saying we're not going to
24 address those, all we want to know is blue now, that
25 kind of leaves something dangling out there to be, you

1 know, that's definitely your call. We clarified enough
2 in your mind that you think there's nothing in there
3 that I think specifically I mean a lot of the points
4 that I have written down in the notes were points that
5 Tom had not so much those things aren't clear but where
6 to find those at if you had questions. If you're good
7 with them, I'm okay with that. I didn't quite kind
8 understand why we were leaving out so much because this
9 section there was a lot of comment back from the agency
10 on this particular section.

11 ROBERT FISHER: Go ahead.

12 DANIEL LITTLE: I think we lose focus quite
13 often of the fact that this is only one small aspect of
14 this entire process. The main process is to get
15 recommendations from the committee on what to do with
16 the Tribal Gaming Working Group documents. These are
17 the questions that the commission has asked. However,
18 there should be other -- you know, we want to make sure
19 there's time for others on that committee to raise
20 questions.

21 So our comparison documents are not the only
22 focus of this exercise. It's to get recommendations
23 from this group on what to do with this document. So I
24 think sometimes we lose focus on that. This isn't the
25 primary focus on what we're doing. It seems that that's

1 where we are right now, we're just going through these,
2 but it is to solicit recommendations from the group.

3 ROBERT FISHER: John.

4 JOHN MAGEE: Going back to a previous section
5 we were talking about, recording all cameras, and I'm
6 trying to figure out, you know, although we're in a
7 different environment, I can't understand why you would
8 have a camera and then not record it. Maybe Jeff can
9 enlighten me here.

10 Because in our case -- I don't know, I can only
11 speak to ours -- you know, we don't spend a lot of time
12 viewing a lot of tapes. A lot of our time is reviewing
13 tapes for past incidents/events, and so we spend a lot
14 of time, you know, reviewing incidents and tapes just
15 for a couple days back or a couple hours or recording
16 back from table games or slots and the floor. And so
17 I'm trying to imagine if you had ten cameras, 100
18 cameras, 200 cameras, that if you weren't recording, and
19 I just could see the manpower time there that it would
20 take to actually watch those in realtime.

21 So maybe Jeff or someone else can enlighten me
22 how that works, where you don't necessarily need to
23 record every camera.

24 JEFF WHEATLEY: Yes, there's plenty of cases.
25 I mean, we have thousands of cameras, and essentially,

1 cameras that don't get recorded are typically handheld
2 zoom cameras that are set in overview displays
3 throughout the property. Obviously, we have all of our
4 banks, entrances, exits, all required areas, those are
5 all covered and recorded constantly.

6 What a surveillance operator will do, they'll
7 have 12 to 24 monitors up in front of them and in the
8 event that they're tracking something or an activity,
9 they'll bring a particular camera up to their front line
10 which is being recorded. So they'll use those handheld
11 zoom cameras that aren't doing recording, they'll bring
12 them to the front line, and when they're brought to the
13 front line, they are being recorded because they're
14 actively looking at something. When they're set off in
15 other positions, they're not be recorded.

16 And the reason for that is, in this environment
17 of DVRs now, the amount of hard drive space, the amount
18 of cooling, the amount of power and backup resources
19 that it would take to record and maintain all of those
20 cameras constantly, 24/7, is just astronomically
21 expensive. So that's the reason we don't record every
22 camera we have installed.

23 ROBERT FISHER: Go ahead, John, and then I'll
24 come to you, Christinia.

25 JOHN MAGEE: I guess I get the cost effect of

1 it. I guess also say anybody who wants to see our
2 surveillance recordings and our recording capabilities,
3 maybe after tonight's dinner we can take a little walk
4 down there.

5 ROBERT FISHER: Okay. Anybody have anything
6 else on the section, 543.23, that hasn't been raised
7 yet? So if we cycle back down here to the end of the
8 documents (indicating on overhead display), there's
9 still a couple of things that got raised that we haven't
10 actually completed how to deal with yet. So in the
11 regulation we had this question about remote access.

12 So, Christinia, I want to come back to you and
13 see if you have a suggestion for how you would propose
14 we handle this in here or whether you want to open it up
15 to the group for more discussion. Go ahead.

16 CHRISTINIA THOMAS: I don't know if it
17 necessarily needs to be part of the regulation but maybe
18 part of the guidance documents, that the remote access
19 requirements be the same for the surveillance system,
20 because I don't think the definition in the IT section
21 fully would engulf the surveillance, that system itself,
22 the way that it's currently written.

23 ROBERT FISHER: Okay. So what if I put
24 here -- I'm assuming that do you don't want to share
25 that with the whole group?

1 CHRISTINIA THOMAS: We'll share it. He had
2 pointed out that in 543 -- the IT one --

3 ROBERT FISHER: 16.

4 CHRISTINIA THOMAS: Right. And the actual
5 definition portion where it listed (inaudible)
6 "including cash and player tracking," adding
7 surveillance in there, if that would cover it, but then
8 again, like he pointed out, I don't know if that would
9 because if you're reading the surveillance section, you
10 might not necessarily think of the remote access to that
11 system or go back to 16 when you're trying to comply
12 with surveillance requirements.

13 ROBERT FISHER: Daniel.

14 DANIEL MCGHEE: Maybe that would be something
15 as remote access in this section somewhere you're
16 stating when remote access is operational or happening,
17 please refer to surveillance section for controls or
18 something. Is that the kind of -- you wanted, or
19 complete, written out?

20 CHRISTINIA THOMAS: It doesn't have to be
21 written out, just refer back to the remote access rule
22 in the guidance documents for the IT portion.

23 ROBERT FISHER: So it's really clarifying that
24 in the IT guidance, I'm calling it the IT, but it's
25 543.16 guidance, right? Is that what your were saying?

1 Or surveillance?

2 CHRISTINIA THOMAS: Yes, the surveillance
3 guidance, refer back to --

4 ROBERT FISHER: So does number 3 do it?

5 MIA TAHDOOAHNIPPAH: I just don't read 543.16
6 in it being applicable for surveillance.

7 CHRISTINIA THOMAS: Just the remote access
8 portion.

9 MIA TAHDOOAHNIPPAH: You get into remote access
10 to who, the vendors? They're a part of our -- they're
11 just another department in the commission, so if we were
12 to remote access to our system or we were to have it at
13 our location, how would that work?

14 ROBERT FISHER: Tom.

15 THOMAS WILSON: So I was thinking about that,
16 Mia, and if we look at the access matrix, if another
17 category were added there called remote access and then
18 it would identify who can have remote access and then as
19 one of your sub notes on the bottom could define remote
20 access has to meet the requirements of, you know, the IT
21 standard -- I'm sorry, I used that term -- the server
22 software whatever standard.

23 Because I would agree that remote access, that
24 is an access requirement just like access to the
25 physical room. It should be defined who is authorized

1 to have remote access in the system, and then you can
2 state that remote access access has to meet the
3 requirements of whatever. Would that --

4 ROBERT FISHER: What's the matrix you're
5 referring to? Where is it?

6 THOMAS WILSON: It's in the guidance document
7 on page eight.

8 ROBERT FISHER: Guidance for the --

9 THOMAS WILSON: Surveillance. Page eight.

10 ROBERT FISHER: Page eight. Right.

11 THOMAS WILSON: So what I'm suggesting is that
12 another column be added that you've got access to the
13 surveillance room, access to surveillance employees,
14 access to serval recordings, and I'm saying access to
15 surveillance via remote access and who that authority
16 can pertain to. And then on the bottom of that chart,
17 do you see where it says "restrictions/conditions,"
18 that's where you can note that that remote access has to
19 meet the requirements of the 543.16. That's my
20 suggestion.

21 ROBERT FISHER: Okay. Daniel.

22 DANIEL MCGHEE: I don't know, as I look at it,
23 if it should technically ever reference that server
24 section, because that section ideally only applies to
25 the servers and stuff associated with Class II gaming,

1 which is what we're here for. Surveillance is totally
2 something else. So remote access, if that does happen,
3 it should probably have the reference to it in the
4 actual regulation, and in the guidance document, it
5 should have a procedure of some sort that would be best
6 practices to monitor remote access.

7 Now, I don't think we should do that here. I
8 think it needs to be noted that it should be included in
9 the reg and then the procedure on how to do it should be
10 included in the guidance document.

11 CHRISTINIA THOMAS: Okay. When you raise the
12 question regarding remote access, I guess the way I read
13 it is more the vendors and not so much, like, the gaming
14 commission access. Is that what you're referring to
15 then, is how would the vendor? Because I can literally
16 sit here and pull up my cameras sitting here.

17 MICHAEL CURRY: See, you've already been vetted
18 through, you've been approved, you have an account, you
19 have user access, you have a log in, passwords, and ad
20 infinitum of clearance and approval. So no, it doesn't
21 include yourself or even your employees who work from
22 home. So it would be vendors and third-party folks,
23 agents, I guess is what we're calling them now.

24 But from those organizations and businesses
25 that are outside the firewall, not so much those are

1 already in the firewall go outside the firewall and then
2 come back in again.

3 ROBERT FISHER: Okay. So we have a bunch of
4 different suggestions for how deal with this. Anything
5 more on this one before we come back and test which way
6 you want to go on this?

7 And, Tom, were you going the say something.

8 THOMAS WILSON: I was just going to make a
9 point that I believe in every jurisdiction that the
10 gaming commission or the regulating authority is outside
11 the firewall. My guess would be I'd be very surprised
12 to find a gaming commission that's inside the gaming
13 firewall.

14 MICHAEL CURRY: On the gaming side inside the
15 firewall, I guess my point is to expand that to include
16 the whole operation itself of the commission, the
17 offices. Well I know those are sometimes geographically
18 separated, across the parking lot sometimes even across
19 town. So, yes, the will be outside the firewall but
20 they're still a part of the key previously approved
21 embedded or the station. So our concern is those that
22 were sitting out either in the parking lot with a
23 wireless laptop or tunneling in from home or tunneling
24 in from a different business or organization, those are
25 the folks that we want to put our reigns on.

1 ROBERT FISHER: Okay. Anything more on this one
2 before we kind of test which way you want to go here?
3 All right. So before we do that, let's talk about the
4 two changes to the guidance document that Kathi raised.
5 So anybody have anything you want to say about the
6 suggestion to remove the variance provision?

7 ROBERT FISHER: Okay. So then on the auditing
8 one, Daniel, to you is it the same? She suggested the
9 whole thing, but now the question is whether we're just
10 doing one number one.

11 DANIEL MCGHEE: If you're going to make it be
12 consistant.

13 ROBERT FISHER: If we took away two, which is
14 the one that says best practices, so let me just double
15 check that that says the same thing in here. Yes, the
16 same, similar provision, basically.

17 Okay. Are we ready to test some of this?
18 Anyone have anything else before we test it? You want
19 to take a break before we test it?

20 Well, actually, I had the request that to
21 ensure that we weren't doing them -- we weren't lumping
22 things together, so the request was made that we do each
23 number one by one. The first two, number one and number
24 two, are changes to the regulation. Number three
25 actually is kind of a split one because it has both

1 suggestions for guidance changes and this other change
2 in the actual regulation.

3 So three and four are kind of either/or. And
4 then five and six are both guidance.

5 So let's test this recommendation, and we're
6 going to do them one at a time. The first one up there
7 is the standard change to the sections a and b removing
8 the word "established" and including, if I have it
9 right, "necessary to identify the risks"; right?

10 And were you getting ready to vote or do you
11 have a question?

12 JOHN MAGEE: Before we move to the vote, my
13 question is, did we answer all of NIGC's concerns with
14 this section?

15 DANIEL LITTLE: Yes.

16 ROBERT FISHER: You realize you've gotten that
17 question about five different ways, so they're trying to
18 make sure that there isn't anything else that's going on
19 that -- because the way that this was presented that we
20 could take the opportunity to talk about here, and what
21 I just heard you say is you're good, you're comfortable.

22 DANIEL LITTLE: Yes, we're comfortable.

23 ROBERT FISHER: Okay. All right. Let's test
24 these. We're going to test these one at a time. So
25 does everybody understand what number one is? It's our

1 usual change to the introductory paragraphs.

2 And I think we did that as universal change,
3 but just to make sure everybody's in agreement, if you
4 support that change to section five, the change that's
5 identified in number one on the screen to 543.23, raise
6 your hand.

7 ROBERT FISHER: Okay. That did not get
8 everybody.

9 JASON RAMOS: I stand aside.

10 ROBERT FISHER: That got everybody.

11 ROBERT FISHER: The next, number two on there
12 is to add the word "required" to section (c)(10)(iii),
13 which is the whole discuss we had about camera views.
14 So I can flip up there to the section on the camera
15 views. There it is up on the screen.

16 So if you support that change to 543.23 Section
17 (c)(10)(iii), raise your hand.

18 ROBERT FISHER: Okay. That got everybody
19 except one.

20 JASON RAMOS: I stand aside.

21 ROBERT FISHER: Stand aside. So that got
22 everybody.

23 All right. So now we're down to the discussion
24 that we had about remote access, and the way in which
25 remote access might be addressed and there were a couple

1 of different suggestions. The first two suggestions had
2 to do with how to accomplish it in the guidance, and so
3 that's number three. And then number four was a
4 suggestion that the regulation should include -- a
5 recommendation to NIGC that the proposed TGWG regulation
6 should also include controls for remote access to the
7 surveillance system and then explain the procedure to be
8 used in the guidance document for the surveillance
9 section.

10 So how do you want to do this? Do you want to
11 test 3 first or test 4 first? Because if you do 4, then
12 you don't have to do 3. Anybody have a preference?
13 Okay. So let's try 4.

14 Let's test 4. So based on the discussion that
15 we had, if you support including a recommendation to
16 NIGC about a change in the regulation -- an addition to
17 the regulation, I should say, and an additional
18 description of the procedure in the guidance document as
19 stated in number 4, raise your hand.

20 Okay. That did not get everybody. So if you
21 did not raise your hands and you're willing to stand
22 aside, raise your hand.

23 Did anybody not raise their hand yet?

24 MIA TAHDOOAHNIPPAH: I think that it it should
25 be under guidance. I think it should be under guidance,

1 you know, that it needs to be in the regulation that the
2 vendors and remote access.

3 ROBERT FISHER: Okay. So how about if we put
4 that number 4 aside for a moment and test number 3,
5 because number 3 addresses what --

6 MIA TAHDOOAHNIPPAH: And just to elaborate a
7 little bit more, I completely understand remote assess
8 and gaming systems and do live games and to download and
9 those kind of things, but I'm just trying to make the
10 same connection into a surveillance system.

11 ROBERT FISHER: If I remember the sequence
12 right, is that the suggestion for number 4 came from
13 number 3 was the question about whether 543.16 actually
14 addressed anything related to the remote access. So is
15 there a way to combine the things that we've been
16 talking about in the guidance for the surveillance
17 section that addresses the concern. So maybe it's not
18 referencing 543.16. Maybe there's another way to do it
19 in guidance.

20 THOMAS WILSON: Well, can we vote on 3?

21 ROBERT FISHER: Sure.

22 THOMAS WILSON: Before we determine if --
23 because we don't know whether that's sufficient or not.

24 ROBERT FISHER: Okay. So 3 asks two different
25 ways to proceed, right? So they could either be

1 combined or separated. So why don't we try to see if
2 people support 3(a) and (b), and if not, we can try to
3 tease them apart. So if that makes sense, or does it
4 make sense to separate them? Combined, 3(a) and (b)?

5 So if you support 3(a) and (b), raise your
6 hand. Okay. Do you want to go through the whole thing
7 and see if anybody stands aside? If you're willing to
8 stand aside on combined 3(a) and 3(b), raise your hand.

9 Okay. We're picking them up but we're not
10 getting close yet. All right. So if you support
11 3(a) --

12 MIA TAHDOOAHNIPPAH: Can we make another
13 recommendation, to add a remote access column in the
14 matrix in 543.28?

15 ROBERT FISHER: I'm sorry. You mean right here?

16 MIA TAHDOOAHNIPPAH: Right, or just take off
17 and then reference.

18 ROBERT FISHER: So this was intended to be the
19 543.23 guidance.

20 MIA TAHDOOAHNIPPAH: And then add the word
21 "vendor," so you were talking about remote access column
22 in regards to vendor and not your own staff.

23 ROBERT FISHER: Does that do it, right there?
24 (Indicating on overhead display.) Is that better?

25 Tom, you were going to say something.

1 THOMAS WILSON: Well, I just want to say that
2 this -- the purpose in the matrix is to identify who has
3 access to what in surveillance. So I feel like it's
4 more than just a vendor even though that was the
5 original question dealing with vendors. But, you know,
6 we're saying should vendors have access to x, y or z.
7 One of those things is via remote access, but I would
8 expect that same consideration be given to the TGRA
9 agents and should they have access via remote access
10 into surveillance or should anybody? So, for me, having
11 that column there was whoever it applies to, you apply
12 it to and set the standard as to whether they should or
13 shouldn't have remote access. And then if they do have
14 remote access, that remote access has to meet the
15 criteria that's established for remote access in general
16 that's identified in 543.16. That was my intent of the
17 column thing.

18 ROBERT FISHER: So for you you would remove
19 that? Is that what you're saying?

20 THOMAS WILSON: Well, yes. It's not access to
21 sensitive areas. It's add a remote access column to the
22 matrix.

23 ROBERT FISHER: That's what the matrix is
24 called, that's why I put it in there.

25 THOMAS WILSON: Strike that from the record.

1 ROBERT FISHER: You know how it comes out in
2 the record, it comes out after that whole description
3 and then there's a line that says "strike that from the
4 record."

5 Okay. John, you had your card up.

6 JOHN MAGEE: Kind of a clarification in my own
7 head how we're proceeding here, because I supported 4,
8 but now are you asking would I support 3(a) and (b) over
9 4 or in absence of supporting 4 would I support 3(a) or
10 3(b)? I'm trying to follow in your line of thinking
11 here.

12 ROBERT FISHER: You got it. Because the
13 question is we don't have consensus on 4, right? And so
14 before we try to -- I thought let's try to see if we can
15 get consensus on 4, I thought we'd try to test 3 and see
16 if people agreed on 3, then we wouldn't have to mess
17 with 4.

18 JOHN MAGEE: Okay. So the way I was looking
19 around the room and see how the vote was going, there
20 was obviously more support for 4 than there was for 3(a)
21 or 3(b).

22 ROBERT FISHER: That is true. So let's take a
23 step sideways for a moment. What is the problem that
24 you're trying to solve and what's the appropriate place
25 to solve that problem? So that's kind of where we are

1 here.

2 JOHN MAGEE: Well, for me, and just speaking on
3 behalf of myself and Pechanga, to me, if you're going to
4 have the remote access into the surveillance room server
5 system, you know, that's a pretty big ordeal, and to me
6 that seems like that should be some sort of a technical
7 requirement or a part of regulations as opposed to a
8 guidance document. And to me it becomes more of a
9 standard, and that's where I was coming from on this. I
10 welcome to hear other people's opinions as well.

11 CHRISTINIA THOMAS: I would actually agree with
12 him. It is a big deal to remote into the system. It's
13 also a big deal to remote into the Class II system in
14 the section that's on remote access is actually a part
15 of the guidance. It's not even part of regulation.

16 ROBERT FISHER: Jeff.

17 JEFF WHEATLEY: I agree with John. And I think
18 you could make it even -- you could just simply state in
19 the reg that the TGRA has to establish what the policies
20 are for remote access, and then that all falls into
21 guidance. So at least there's a check there for the
22 NIGC to go and say, okay, and they can check and see
23 what are your actual procedures, whether it be an access
24 list, a vendor access list, is there an approval process
25 that you have to go through prior to getting access to

1 the system, but at least it's somehow referenced in the
2 reg that there has to be a procedure set forth in that
3 procedure itself to be in the guidance.

4 ROBERT FISHER: Okay. Daniel.

5 DANIEL MCGHEE: Two possible ways to fix this,
6 which may be okay with me about this is, it may be
7 implied in a way, because if you look at surveillance,
8 the reg, if you look at (c) it says "controls must be
9 established in a manner that's designed to prevent
10 unauthorized access."

11 All right. So there already should be controls
12 that would prevent an unauthorized remote access.
13 Access is access, whether it be remote or not,
14 technically. So it could be implied there. But
15 underneath there where it says, to prevent unauthorized
16 access or activities that (inaudible) such controls must
17 include but are not limited to the following, and then
18 you just add a number that says "remote access" period.
19 You don't go any further than that in the regs.

20 So it was implied anyway, but, obviously, if
21 someone's going to be remotng into your system, you
22 need to have some control over it. So all you're saying
23 is just add a number in that list that says remote
24 access, and then your guidance document can be as
25 detailed as you want it.

1 So I don't know if Mia thought maybe we were
2 really going to detail out remote access in the system.
3 But, no, I think it's just a reference to whatever you
4 do you have some control over how you allow people
5 having remote access without -- I'm just saying a
6 number, two words.

7 ROBERT FISHER: Where are you suggesting to put
8 it?

9 DANIEL MCGHEE: Under (c) as either number --
10 whatever the end is, 12, is that right? At number 12,
11 or if you find somewhere to put a list, you just add it
12 to the end of the list.

13 ROBERT FISHER: So it starts right there at the
14 top in that first paragraph, "Such controls must
15 include," and then you'd add a new number that says
16 "remote access."

17 DANIEL MCGHEE: Or you can say -- if you go
18 back up, actually, "controls must be established and
19 (inaudible) to prevent unauthorized access which
20 includes remote access and/or activity." Any way you do
21 it, you're just putting it there. So maybe in number
22 12, just put it in that paragraph.

23 ROBERT FISHER: Okay. So, Mia, do you see what
24 he's talking about? So does any of that work for you or
25 address the concerns that you have? No? Are you

1 willing to do that?

2 MIA TAHDOOAHNIPPAH: I just think it's better
3 in the guidance document.

4 ROBERT FISHER: So the recommendation was to
5 include it, both, reference remote access in the
6 regulation but also explain it in the guidance document,
7 that was the question.

8 Okay. So we could test it, number 4 again, or
9 the variation that you just made, Daniel. It includes
10 putting it in the reg. So is this something you feel
11 strongly about or that you're willing to stand aside on?

12 If you're willing to stand aside, then we're
13 there. Okay. So we're there. So let me just say, for
14 those of you that support this, what is your preference?
15 Is it to actually make a change the way that Daniel
16 suggested or to just make a recommendation that it
17 include remote access?

18 What's your preference, Daniel?

19 DANIEL MCGHEE: Four.

20 ROBERT FISHER: And that is what we tested. So
21 did anybody have anything more on this before we call
22 it, these changes to the regulation?

23 (No audible response.)

24 ROBERT FISHER: Okay. Remaining on this are
25 the changes to the guidance that were proposed. One is

1 to remove the variance section. So if you support that
2 recommendation, raise your hand.

3 We're checking this right here. Those of you
4 that didn't vote, are you willing to stand aside?

5 Michele, did you have your hand up? Yes?

6 Okay, so that got everybody. Okay. So now we
7 are on the last one here, which is to make the change to
8 the 543.23 guidance that we made to the 543.16 guidance,
9 and in the auditing and accounting section, remove the
10 subparagraph 2.

11 So if you support that, raise your hand.

12 If you're willing to stand aside, raise your
13 hand.

14 Okay. That takes care of section 543.23. So
15 by my clock it is 4:15. We have an hour left before
16 we're scheduled to do public comments at 5:15, because
17 we have a 5:30 ending time tonight to provide sufficient
18 time for the dinner.

19 So how about if we take a stretch break and see
20 if we can start up again in under ten minutes so that we
21 can spend just a little under an hour on the auditing
22 and accounting section before we break for the day.

23 Let's take a five-minute break.

24 (Recess.)

25 ROBERT FISHER: We're on 543.19, audit and

1 accounting. It's the topic we'll be winding down the
2 day with. Finally we're up to auditing and accounting,
3 543.19, so let's start the same way we start with all
4 the sections and ask somebody from the TGWG to give us
5 an overview of this consolidated section. We have
6 talked briefly about this section once before, and there
7 actually is, later on, buried in the document, a note to
8 NIGC on one of the sections.

9 So it looks like, Kathi, you were going to give
10 us the overview.

11 KATHI HAMEL: I will take a stab at it. We
12 looked at auditing and accounting and functions that
13 take place in the year-end process in both the audit of
14 the operations as well as the audit of internal audit
15 and accounting and tried to take all those pieces out of
16 the different parts and bring them into one area.

17 Again, like we did in other sections, we said
18 there had to be a real high level of control that had to
19 be established. We didn't go into a lot of detail. We
20 didn't just specifically pull out player tracking or
21 deposit accounts, but we said that all of the funds that
22 are controlled in the gaming or part of the revenue
23 stream would be controlled in the same fashion.

24 We looked at the operational audit of the
25 revenues separately than the accounting process as well

1 as the annual -- and the internal audit as well as the
2 annual audits and tried to bring them all into one
3 document.

4 And I know there's lots of questions by the
5 NIGC, and it may just be terminology. I know one of the
6 questions was calling revenue audit operational-wise. I
7 think it's six of one, half a dozen to the other. And I
8 think traditionally -- and I don't think I'm speaking
9 out of school, but there's usually a reporting structure
10 of your audit team to your accounting team, so that's
11 why we said that they have a close relationship.

12 Your accounting team eventually takes the
13 transactions for your revenue stream and posts them to
14 your general ledger and audits them against balancing,
15 so that's what we tried to do, was the whole process.

16 ROBERT FISHER: Okay. Thank you very much.
17 Over to NIGC. So, Rest, are you going to --

18 REST WEST: I guess I have to do it. Well, I
19 took the approach, and I know that as Kathi was saying
20 there were some different areas that were pulled from
21 different places of the draft MICS into this TGWG
22 version, and what I attempted to do is break it down
23 into those four different areas and have different
24 comparison documents for each of those four areas, and
25 those were all sent out as a 42-page document.

1 So originally the accounting standards, 542.19,
2 543.19, if you will, were designed as a result of what
3 we deemed as the high frequency audit reports, site
4 visits, other indications that there were a lot of --
5 well, there were several inadequate accounting
6 departments at gaming operations. So that's the intent
7 of 542.19, the development of 542.19 and the subsequent
8 543.19. So in this 42-page document it starts out with
9 the original -- comparison of the original auditing
10 section 543.19 that will go from page one to page ten.

11 Page 11 through page 17 discusses internal
12 audit, the comparison and any attachments that may be
13 relevant. 18 to 27 discusses what is titled by the TGWG
14 as annual audits, but I think most people commonly refer
15 to them as CPA testing or the AUP report.

16 So the fourth segment of this 42-page document
17 is what we originally referred to as revenue and audit,
18 pages 28 to 42. In breaking out these comparisons at
19 the start of these comparisons, there's a general
20 overall statement that I believe is included in each of
21 the four sections about the history of the 543.19
22 section and its intent and what it was designed as a
23 response to, and then we have comments on various parts,
24 mostly on the TGWG standards themselves. In some cases
25 there are comments on guidance. I think the guidance is

1 not as adequate as it is in other sections the TGWG
2 developed, but that's just my opinion. So we can start
3 by going to the first comparison document. Or does
4 anyone have any questions at this point about --

5 DANIEL LITTLE: Are you looking at PDF if you
6 were to print it out --

7 ROBERT FISHER: It doesn't go continuous all
8 the way to the end.

9 REST WEST: No, no.

10 ROBERT FISHER: So actually for this one,
11 because of that, I actually have the comparison document
12 up on the screen; otherwise, it might be a little bit --

13 So we're talking up here about where the
14 comments are starting in the comparison document. And
15 so the comparison document is up on the screen and so I
16 can scroll back and forth between those two things if it
17 would be useful. So I'm going to scroll down to page
18 eight here. So go ahead, Rest.

19 REST WEST: So what does the committee prefer
20 to do, start on the first comparison document and go
21 through, or do they have any comments on the overall
22 comment to the combination of three or four different
23 areas, distinct areas, into one document, which is what
24 the TGWG appeared to do.

25 ROBERT FISHER: I'm not sure I understand.

1 What are you asking them?

2 REST WEST: Whether we want to start going
3 through the comparison documents or does anyone have any
4 comments on how the TGWG developed their document.

5 DANIEL MCGHEE: The audit and accounting
6 section under the TGWG is where you're at? How it is
7 now versus -- each would be four different sections.

8 ROBERT FISHER: Right. Did you want to take a
9 stab at answering it? Because I thought the answer was
10 consolidate it.

11 DANIEL MCGHEE: I don't have a problem with it
12 like it is, but I can only speak for myself, my tribe.

13 REST WEST: So we have 30 minutes to start on
14 this?

15 ROBERT FISHER: Correct. We have 30 minutes
16 today, and whatever we don't get done today, we'll pick
17 up in the morning.

18 REST WEST: If we go through one of the
19 comparison documents, we definitely can go back to it
20 tomorrow.

21 ROBERT FISHER: Correct.

22 DANIEL MCGHEE: So start on page eight; is that
23 right?

24 ROBERT FISHER: Yes. So let's start at the
25 beginning and work our way through.

1 DANIEL MCGHEE: And you start comparing at E,
2 Accounting, I think, that's where I first started seeing
3 your comparison, E, at the very top?

4 REST WEST: Yes. (Inaudible.)

5 ROBERT FISHER: So wait, nobody can hear you.

6 REST WEST: So we start at E as far as the TGWG
7 version, E, accounting controls must be established, and
8 so forth.

9 ROBERT FISHER: That's on page eight?

10 REST WEST: That's on the first page, that's
11 just a --

12 DANIEL MCGHEE: No, eight. Page eight is the
13 comments, but they only comment from the document
14 starting at E forward. Everything that happened before
15 E they had --

16 KATHI HAMEL: The comments for D are in another
17 section of the 42-page document, and it starts on the
18 third set of numbering, page one of ten. I don't know
19 what page -- physical page number. On page 18 of the
20 physical 42 pages is the discussion of annual audit.

21 REST WEST: 18 to 27 are the PDF documents.

22 ROBERT FISHER: Okay. Can we just make this
23 simple since we don't have that much time left? Can we
24 just go to page eight and start at page eight?

25 REST WEST: Again, page eight has an overall

1 comment that's applicable to all the four different
2 comparison documents. It gives a history of why 543.19
3 was developed. First comment down at the bottom of page
4 eight has to do with a deletion of, I believe, the
5 requirement that the financial statements or financial
6 accounting records be prepared in accordance with GAAP,
7 which is kind of a standard -- it's a standard
8 requirement, but I just wanted to point that out that I
9 didn't see that required in the TGWG standards.

10 KATHI HAMEL: It isn't a standard. It's just
11 maybe in a little different location. If you look at
12 (c), one of the things that we recognize when we only
13 talked about conforming with GAAP and that these are
14 government financial statements and they really have to
15 abide by GASB and FASB and not just GAAP. So in (c) --
16 (Inaudible. Reading from document.) -- standards such
17 as GAAP, SSAE and standards GASB and GASB. In the event
18 of conflict within the MICS and the incorporated
19 external standards, the external standards prevail." So
20 we didn't just single out GAAP. We tried to look at
21 those standards.

22 THOMAS WILSON: Page 12 of the guidance
23 document, item 2, says that the gaming operation must
24 conform to generally accepted accounting principles,
25 GAAP, when preparing financial statements and completing

1 subsidiary ledgers.

2 REST WEST: This was a comment on the standard
3 itself. I wanted to make sure everyone -- and most of
4 these, a lot of these are just on the standards
5 themselves. The actual guidance may provide some more
6 direction, but the actual standards say to consider
7 incorporation of other -- well, I think you should
8 review -- I mean, require the financial statement to be
9 prepared in accordance with GAAP and GASB, FASB,
10 whichever you elected, so you can actually be under both
11 of them. But, you know, if you look at your audit
12 opinions, the auditor will say the financial statements
13 are presented fairly in accordance with the generally
14 accepted accounting principles of the United States. So
15 it's not a super big issue, but I just wanted to point
16 that out.

17 ROBERT FISHER: What's next?

18 REST WEST: Down under the "deductibility for
19 gross gaming revenue," it appears that the TGWG proposal
20 deletes this entire subpart, which is a matrix. It
21 provides direction through gaming operations or what can
22 and cannot be deducted from gross gaming revenue or
23 added or whatever the situation is. We constantly -- we
24 get a lot of questions from gaming operations as to what
25 should be included or what should not be included in the

1 calculation of gross gaming revenue, so this is a
2 frequently requested issue from gaming operations,
3 especially in the preparation of their annual fee
4 worksheet. So that's why that's in there.

5 ROBERT FISHER: No, I see that. I guess are
6 you asking them a question or just making a comment?

7 REST WEST: I'm making a comment.

8 ROBERT FISHER: You deleted it. So, Kathi, can
9 you --

10 KATHI HAMEL: I have two things. One, the
11 definition is in IGRA; right? And, two, the calculation
12 for the fees is where that more extensive information
13 needs to reside. I don't know that number, sorry. 25?

14 ROBERT FISHER: Okay. So, in essence, you're
15 saying it's covered elsewhere; yes?

16 KATHI HAMEL: Yes.

17 REST WEST: It's not covered in detail in IGRA,
18 and it also does not only apply to the work fees, it
19 applies to your gaming revenues on your financial
20 statements, so it's -- in fact, it's part of the
21 regulations. The gaming operations are supposed to
22 prepare a reconciliation from their audited financial
23 statements to their annual fee worksheets and have that
24 reconciliation available for review. So, you know,
25 they're intertwined. It's not just for the purposes of

1 the fee worksheets. It's also for the purposes of a
2 fair presentation of gaming revenues.

3 ROBERT FISHER: Okay. Is there anymore on that
4 one?

5 (No audible response.)

6 ROBERT FISHER: Okay. What's next?

7 REST WEST: I had a comment about the deletion
8 of the circumstances where a credit instrument that has
9 been written off as uncollectible gaming deductions.
10 That's a specific instance where it is part of your
11 calculation of gaming revenue, so it's not a real big
12 issue, but I highlighted it anyway.

13 ROBERT FISHER: Kathi.

14 KATHI HAMEL: The credit section has a very
15 thorough regulation -- recommended regulation on
16 write-offs and -- (Inaudible.)

17 ROBERT FISHER: Okay. Do you know if it
18 includes, as far as deductibility, the requirements for
19 deductibility.

20 KATHI HAMEL: I don't believe it does.

21 REST WEST: So that's what I'm discussing. And
22 then the last comment on this Comparison number one is
23 the amendment or the TGWG proposal that is the last --
24 it's provided on page ten, the last comment, and then it
25 deletes the bulk of (k) -- (2)(d)(ii) maintain and

1 preserve all financial books, records, and relevant
2 supporting documentation. Again, we get frequent
3 inquiries about the retention periods from gaming
4 operations, especially real common recently has been the
5 maintenance of cash-out tickets. So we answered a lot
6 of the responses to those types of inquiries as far as
7 the records.

8 KATHI HAMEL: I agree. There needs to be a
9 bulletin that tells us in detail. I just don't know if
10 it should be a regulation, because that piece of paper
11 or that document may change and it may go from a paper
12 format to an electronic format. So I agree that there
13 needs to be maybe guidance, but I don't know if it's a
14 regulation so strict that says everything has to be kept
15 for five years.

16 ROBERT FISHER: Okay. Back to you.

17 REST WEST: Okay. The next comparison, the
18 number two, is internal audit. It should be starting on
19 your PDF, page 11.

20 ROBERT FISHER: Page five. Okay. Here we are,
21 543.42.

22 REST WEST: And this is where I have another
23 issue on the inclusion of this function in the TGWG
24 543.19, because it's generally not considered an
25 accounting and audit function. It's a separate

1 department. In the current MICS and prior MICS, it's
2 separate sections that can be given to internal audit
3 departments or the CPAs or whoever, so an overall
4 comment is I don't think it belongs -- it basically
5 belongs in this document -- I think it's better to be
6 identified as an individual section in the MICS.

7 ROBERT FISHER: So I'm wondering what we should
8 do with that. So we've now gone through a bunch of
9 sections in which the TGWG folks explained what they
10 did. You've, Rest, raised some questions about things
11 that were deleted or moved or preferring to see it in
12 different sections. So what should we do with that? Is
13 there something to talk about or do the committee
14 members just simply want to know what it is that -- I
15 mean, it's in the document already, what you said, so
16 I'm unclear what we should do with these and whether
17 this is a useful exercise to be going through.

18 DANIEL MCGHEE: I think maybe if we could have
19 some specific questions like before, that would be more
20 helpful. If the question is why, then we did explain
21 why, and that's about all you can do. And then opinion,
22 opinion. If you want a question, that would be better.

23 REST WEST: So I guess I can go back and ask
24 that question, is why is it included in this section?

25 ROBERT FISHER: Which? The things that you

1 were referencing in 543.42?

2 DANIEL MCGHEE: I think what it was is we took
3 all those references to auditing and accounting and I
4 think we just combined them into one section, not that
5 it did belong or didn't belong, it just made sense to
6 take all these areas that were financial, accounting and
7 auditing in nature and consolidate. So when it came
8 (inaudible) section, they should still be meeting the
9 same requirements, and all we did is just reorganize, I
10 guess would be the meaning behind it. I would be more
11 worried about what it said and if it meant (inaudible)
12 that were out there than where it was.

13 REST WEST: Okay. The top of page six I've got
14 a comment -- six of seven, does the TAC committee not
15 feel it's necessary to have semiannual audits of bingo?
16 It's a Class II operation. It would be, by far, your
17 highest revenue-generating center in your property.

18 DANIEL MCGHEE: I remember now the original
19 release had -- there used to be two audits of every
20 section, and then it went to one of every section, even
21 bingo, I think. I think they all went to one, and
22 that's why they were only required to do one audit. So
23 it's a question, basically, do we think audit other
24 sections that are required to be audited under the
25 internal audit section when time is sufficient but

1 possibly maybe bingo section be two? Because right now
2 the way it's written, the TGWG, is they're all still
3 just one, the requirement.

4 ROBERT FISHER: So anyone want to respond to
5 that question?

6 KATHI HAMEL: In the guidance document, which is
7 section L, page 13 of 15, internal audit (I)(ii), it
8 says, Scope and frequency of audits. In the guidance
9 document we said internal audits will be performed for
10 each gaming department of the operation at least
11 annually. It says, the internal auditors should
12 coordinate with (inaudible) to determine the frequency
13 of these and additional audits as well as the
14 departments to be audited outside the scope of each
15 gaming department.

16 So, again, risk-based auditing, you evaluate
17 whether or not you need to do it once or twice or every
18 month.

19 ROBERT FISHER: Okay. Back to you. So the
20 minimum is once. That's what I heard.

21 REST WEST: Okay. Under internal audit
22 personnel, the TGWG version eliminates requirements for
23 separate internal audit department for Tier C gaming
24 operations but retains a requirement of independence for
25 those individuals performing internal audits. How would

1 someone who is an employee of the operation maintain
2 their independence if they're performing -- so they
3 could be independent as far as performance of internal
4 audit function?

5 THOMAS WILSON: I think that there's a wording
6 problem in the guidance document, because I read it the
7 same way that -- it's talking about auditors have to be
8 independent, but then they use this term "internal," if
9 they're internal to the operation. So I guess the
10 fundamental question is, do we have auditors that are
11 part of operations in a gaming facility, and, if so, how
12 is their independence determined to be an independent
13 entity if they're a part of management? Because
14 somewhere in the guidance document, I know I've seen the
15 same statements that worry about internal to the
16 operation, and I think it's an error. I don't think
17 that's what you mean to say, but it could be.

18 ROBERT FISHER: So you need to mike, Daniel.
19 I'm sorry.

20 DANIEL MCGHEE: I know our casino has a big
21 internal audit position that's under management. I know
22 we have a compliance division, but they have the
23 auditing division.

24 THOMAS WILSON: Okay. So if they do, then if I
25 understand Rest's comment here, is that if your internal

1 audit function is a part of your operational management
2 of the casino, then they're inherently -- they're not
3 independent, according to the standard that you're
4 outlining, or the Tribal Working Group has outlined, if
5 they need to be independent of management.

6 DANIEL MCGHEE: So they don't perform the
7 internal audit as outlined here, but they do have -- I
8 thought you asked -- the question was, did any of the
9 casinos have auditing requirements.

10 THOMAS WILSON: Well, the reason I'm asking
11 that, yes, they have auditing departments, but do they
12 perform the internal audit work that is outlined in the
13 regulations? And if they do, if it's anticipated that
14 those entities would perform these audits, then you have
15 to ensure that they're independent of management. So
16 Rest's comment is that if they're not independent of
17 management, then they really can't perform these audits
18 independently.

19 So, okay, let me try this another way. If the
20 Tribal Working Group document anticipates that internal
21 auditors who are a part of a gaming enterprise
22 management are going to be the ones performing these
23 compliance audits, then how do you ensure that they are
24 independent according to the definitions that the Tribal
25 Gaming Working Group document says that this group is

1 supposed to be independent of management?

2 ROBERT FISHER: Go ahead, Kathi.

3 KATHI HAMEL: I think in the regulation there's
4 two statements. One, that they're independent of the
5 gaming operation and they report directly to the tribe's
6 TGRA audit committee or other (inaudible) designated by
7 the tribe.

8 ROBERT FISHER: Where are you reading?

9 KATHI HAMEL: I'm on the guidance document,
10 section L, page three of five, internal audits, 2 and 3
11 on the reg. That's the reg.

12 ROBERT FISHER: The reg. Right. So that's --

13 KATHI HAMEL: The reg section. I'm sorry.

14 ROBERT FISHER: (F), okay, which is now up on
15 the screen.

16 KATHI HAMEL: (F), yes. Because one of the
17 other things that we did is there is no tiering for
18 internal audits.

19 THOMAS WILSON: Number two, internal auditors
20 are independent of the gaming operation with respect to
21 the departments subject to audit (auditors internal to
22 the operation, officers of the TGRA.)

23 When you say "auditors internal to the
24 operation," what does that mean? Because that's what's
25 throwing me. I read that as --

1 ROBERT FISHER: Okay. So wait. We have got to
2 have one person at a time, if we could.

3 THOMAS WILSON: I read that as auditors -- I'm
4 going up until we get to the parenthesis, then I get
5 confused, because it says "auditors internal to the
6 operation." Who does that mean?

7 ROBERT FISHER: Okay. Mia, you were going to
8 answer that?

9 MIA TAHDOOAHNIPPAH: My interpretation when I
10 read it was that if you're doing an internal audit of
11 that particular department, you must be independent of
12 that department. So they can be three, and then in
13 parenthesis, it can be either an auditor internal to the
14 operation, it can be somebody from TGRA, or it can be a
15 CPA or an outside firm. If it's somebody who is
16 internal to the operation, they must, if they're going
17 to do -- you know, let's say that they're internal audit
18 part time and then the other time they work for drop and
19 count. Well, then they cannot perform the drop and
20 count audit, but they can do the other audits.

21 ROBERT FISHER: Tom.

22 THOMAS WILSON: So my question is that when we
23 talk about independence, though, it's broader than just
24 from a department to department. It has to do with the
25 fact that can an auditor who reports through management

1 truly be independent on the audit work that they're
2 doing over that management's processes. It's not just
3 that, okay, yes, I'm not part of cage and vault;
4 therefore, I'm going to walk in and do this audit at
5 cage and vault.

6 And I guess from my perspective it's not -- I'm
7 not talking about these operational reviews or things,
8 but I'm talking about, when we are looking at doing a
9 compliance audit of the standards and the guidance,
10 those folks should be independent completely from
11 management. And, in my mind, it would be inappropriate
12 for it to be an employee of management who is conducting
13 those audits because I don't think you can really meet
14 the independence criteria in that scenario.

15 So maybe I'm looking at this from two different
16 types of audits, but if we talk about independence
17 fundamentally, an employee of somebody else who is over
18 you cannot be truly independent to conduct an audit.

19 ROBERT FISHER: I have to interject here. By
20 clock time, we're at 5:15, which is our appointed time
21 to shift for public comment. So there are three cards
22 that are up, so we're either going to take all three
23 cards and then move to public comment --

24 (Inaudible comment.)

25 ROBERT FISHER: But if you do that and somebody

1 steps forward, then what are you going to do?

2 Okay. We might have to stop here if there's
3 public comment; otherwise, we can keep going for another
4 15 minutes on this.

5 So we're at the point in time for public
6 comment. Is there anybody in the audience that wishes
7 to provide public comment to the committee at this time?

8 RITA HOMA: I do.

9 ROBERT FISHER: You do. Okay. All right. So
10 we need to put this aside for now and we'll come back
11 to -- we'll pick up on this question of the independence
12 and independent internal auditor when we come back
13 tomorrow morning.

14 And so who is going to do our timekeeping
15 today?

16 Okay. So you have to give us a second here to
17 get organized, if you would. So you know the procedure
18 is that you have three minutes to provide public comment
19 and the committee has the opportunity, if they so
20 choose, to respond back or to answer questions or ask
21 you questions. And it's not expected that the committee
22 will respond to specific questions right here and right
23 now. They're just looking for information.

24 So could you please tell us who you are and
25 then we can go.

1 RITA HOMA: Hello, I'm Rita Homa. I'm a member
2 of (inaudible) of Oklahoma. I have formally served the
3 National Indian Gaming Commission as its vice chairman
4 from -- well, from 1999 to 2002. I have really enjoyed
5 listening to the dialog today. I think that I've been
6 to many, many, many of these meetings, and I know what
7 you're wrestling with.

8 We wrestled with it back, you know, around the
9 year 2000. We did the first revision of the MICS. And
10 I only wanted to raise a little bit of history
11 because -- well, because it's beneficial. It's
12 beneficial to you all in your task, I think, to know
13 kind of how all of this has developed.

14 And one of the biggest problems with the MICS
15 from the very, very first -- from its very first
16 iteration is organization. And I have noticed all
17 afternoon you all have been struggling with that issue
18 of how the MICS is organized and how the MICS operates
19 together. And I was very happy to participate in a TGWG
20 process and kind of bring to bear the experience,
21 because I have sat in on every MICS and TAC since I was
22 in the NIGC. I have gone to every meeting. I was part
23 of the working group, and so I see how difficult it is
24 to get your arms around the MICS, especially if you're
25 not up to your eyeballs in it for years and years and

1 years out.

2 So organizationally -- you know, as to this
3 last issue, what you all were talking about,
4 organizationally, part of the reason that it was
5 organized, all of the audit and accounting were brought
6 together in one section is it was -- the MICS is not a
7 useful document to the average person. I'm in the
8 trenches with my gaming regulatory agencies where I'm
9 general counsel, and I work on these issues all the
10 time. And I'm always beings asked, well, you wrote the
11 MICS -- well, actually, we didn't technically write
12 them; we revised them -- you know, so what does this
13 mean? And they're not user-friendly and they haven't
14 been made user-friendly, I think, until the work of the
15 TGWG.

16 And with respect to, you know, this idea of
17 independence, this is no different than what the MICS is
18 today in the way things are supposed to be done in terms
19 of internal audits. You know, some tribes, they use
20 their gaming commission to be the internal auditors.
21 Some tribes have their own internal audit functions.
22 The people of Chickasaw Nation, we have like an extra;
23 we have the tribe's own internal auditors.

24 So, I mean, every tribe is really free and
25 should be free to organize their internal audit function

1 with the key concept, which is built into the MICS, in
2 all iterations of the MICS of this idea of independence.
3 And that merely means independence from the function
4 that you are auditing. I can't audit myself. I can't
5 audit the papers that I prepared. That's what we mean
6 when we talk about independence and segregation of
7 functions. That's the other concept with independence.

8 Hey, is my three minutes up?

9 ROBERT FISHER: Okay. So you do need to wrap
10 up, if you would.

11 UNIDENTIFIED SPEAKER: I make a motion to let
12 her continue.

13 RITA HOMA: Thank you. I appreciate that.

14 So I think this works really well. And I hope
15 at the NIGC staff, in particular, that -- you know,
16 because I haven't seen you at all of these meetings for
17 all of these years, and sometimes people get left out of
18 the discussion and they miss things.

19 I took physics in college, and I knew about
20 three lectures in where I had missed something really
21 important. And I kind of heard that today, and I don't
22 mean that to be critical of you. I think that you're
23 doing all of this in good faith, and I think the NIGC is
24 doing this whole process in good faith. But I think
25 there's some concepts that we're missing here, and just

1 from what I have observed today, and one is, this is not
2 the be all and the end all. You have the big
3 regulation, that sets the standard; right? Then you
4 have the guidance documents, but those guidance
5 documents aren't the end all and be all because now it's
6 going to be turned in to tribal regulations that are
7 promulgated by the Tribal Gaming Commission and then
8 it's going to become internal control procedures that
9 are implemented at that level, and that's where your
10 detail is.

11 You know, we can't fill all of the holes. We
12 can't tell somebody how to do every single function
13 because it's just not logical to try to do that. We
14 have too much variety. You know, we thought we were so
15 cool when we came up with the tier system. That was
16 our -- Terry and I, that was our innovation, was the
17 tier system. But that was really, yes, this will answer
18 so many one-size-don't-fit-all problems. But the
19 problem with that was it made the regulation humongous
20 and hard to use. So we want to fix that problem too.

21 I think you all are working with a very good
22 work product that a lot of really experienced,
23 hard-working people have rolled up their sleeves and
24 brought their best minds, their best thoughts, their
25 best expertise to bear. You know, don't lose track of

1 that. This is a document that comes from a lot of years
2 of experience, combined years of experience. Don't get
3 caught up in, well, you know, this word was over here
4 and this word was over there.

5 Remember -- and I can't understand why people
6 don't see from the federal perspective that this is
7 actually better for them, because if you made a mistake
8 in your guidance document, say we did something real
9 screwbally in the credit section -- I wrote that, it's
10 going to be something real screwbally in that -- you can
11 fix it without going through this whole rigamarole. You
12 know, is that standard for that surveillance system, you
13 know, is just stupid three years from now because
14 technology has changed, well, then, you don't have a
15 stupid, outdated regulation. You've got a guidance
16 document that's easily changed.

17 You know, I mean, really look at the pros and
18 cons of this, and after the enforcement question, yes,
19 this is all going to be enforceable, assuming that the
20 authority exists within the agency to enforce these
21 regulations. And the reason they're enforceable, why,
22 you ask, because the regulations say these are the
23 things you do. The guidance document says this is how
24 you must do it, or if you don't do it this way, now the
25 burden has shifted to you to show that you meet these

1 standards that we have set, these clear, concise,
2 easy-to-read standards.

3 This thing works really good. Take advantage
4 of it. It offers good advantages to both tribes and to
5 the NIGC. It's kind of a marriage of the two interests,
6 and I hope you see that. I hope you see this is not the
7 be all and end all, because believe me, our tribal
8 gaming regulatory agencies, they up the standards from
9 here, and that's their job as primary regulators.

10 So that's it. Thank you. Thank you for
11 letting me talk.

12 ROBERT FISHER: Thank you. Does anybody else
13 in the public wish to provide public comment? Okay.

14 TRACY BURRIS: My name is Tracy Burris. I'm a
15 gaming commisioner at Viejas here in Southern
16 California. I'm where you were at 15 years ago. I was
17 on the first MICS advisory committee. I want to tell
18 you all the lesson I learned then, and I've been waiting
19 for it to change since, but one of the smartest persons
20 on that one, and still one of the smartest people in
21 this industry, is Kevin O'Toole, who is executive
22 director for the Pennsylvania Gaming Control Board. He
23 used to be at Oneida. He came from New Jersey. He's a
24 lawyer, CPA, and got every title, every little thing you
25 can think of. But the one lesson I learned in the first

1 one -- and it took me a while -- when we started out we
2 had nine different jurisdictions compared and
3 contrasted. We tried to see how it fit for Indian
4 Country. Well, we were all concerned and, I think it
5 would be fair to say, paranoid about the criticism that
6 we received.

7 Kevin kept saying quit overreading into it. Be
8 careful, I will tell you, because I've been on the first
9 and the third advisory deals, and sitting through this
10 for the last 15 years, be careful and think it through.
11 It doesn't hurt to think your actions out. Because the
12 example is the surveillance. Who cares about the
13 surveillance? Today it's turned into a tool that
14 certainly for tort claims, if you think about it hard.

15 That serves your internal controls, that's what
16 those documents are for. Do you have an ADA, whether
17 it's a state or compact with the county or use attorney?
18 What do you got when you go to go court? I can tell
19 you, nine times out of ten I've got nothing. So don't
20 put more into it than it is.

21 Gentlemen, with all respect, if I can't go to
22 court with it, then it does me no good. So I don't need
23 all these cameras. And the same way with independence,
24 don't overread independence into it, but it was
25 written -- we looked at commercial industry first. I

1 know it's Indian Country and we've made the adjustments.
2 Don't overread into what independence is.

3 And think about it, if you do, if you really
4 look hard, that those were the correlations what
5 business is, how was the business structured, how it is.
6 The other thing I used to say, when is it tribal
7 business; when is it business, and when is it tribal?
8 Tribal is the right for the tribe to decide and it's
9 TGRA. Tribal business is the right of the business
10 itself to run and operate and decide, and the other is
11 business and what we think the industry does as a whole
12 and how does it benefit us.

13 So the only thing I would tell you with all
14 respect -- and believe me, I understand. My heart goes
15 out to you. I've done that many times. Don't overread
16 into it. Go back and compare and contrast at your own
17 facility, go back to your friends and talk with other
18 people.

19 Just don't put more into it because we can't
20 protect everything, and I'd love to tell you we could;
21 we cannot. We can't protect every tribe, and I don't
22 give a crap, in a sense, because I can't have it bring
23 down that which is good, and I don't like the criticism
24 from someone that doesn't do a good job. I don't like
25 that. I know we've got to be prepared for that, but if

1 I'm doing a good job, I'm going to show everyone how
2 good of a job I'm doing. And the rest of us that are,
3 will do it, and the rest, that's up to these guys. I've
4 said it before, that's up to the NIGC to figure that one
5 out.

6 Thank you very much.

7 ROBERT FISHER: Thank you. Anybody else in the
8 audience wish to provide public comment?

9 (No audible response.)

10 ROBERT FISHER: Okay. Thank you very much.
11 That actually takes us straight to 5:30, which is our
12 appointed time for ending today, so we'll stop here for
13 the day, pick up tomorrow back on the auditing and
14 accounting section. We'll start up at 8:00 a.m.

15 (The meeting adjourned at 5:30 p.m.)
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