



January 31, 2011

Lael Echo-Hawk
Counselor to the Chair
National Indian Gaming Commission
1441 L Street NW
Suite 9100
Washington D.C. 20005

Dear Counselor Echo-Hawk:

We, the Commissioners of the Nisqually Tribal Gaming Commission, with consent of the Nisqually Indian Tribal Council take this opportunity to offer comments.

CFR 25 Part 514 NIGC Fee Calculation

The Nisqually Tribal Gaming Commission would support calculating fees on an annual basis dependent on and consistent with the financial calendar of the tribal gaming enterprise;

CFR 25 Part 514 Late Payment System

Issuing an NOV as a violation for submitting fees untimely is not in the best interest of displaying a cooperative working relationship between the Tribes and NIGC. We feel late notices with a progressive approach would be much more amenable;

CFR 25 Part 537 Appeal of an NOV

We agree that when NIGC has clear authority to issue an NOV that there must be a concise outline and procedure for dispute resolution including that which allows for equal protections for those parties involved;

CFR 25 Part 542 Class III Minimum Internal Control Standards

The Nisqually Indian Tribe strongly supports the CRIT decision citing that NIGC has no authority to enforce or promulgate internal control standards in regard to Class III gaming. The Nisqually Tribal Gaming Commission respectfully suggests that the MICS should be presented as recommendations only and each Tribe should adopt their own Minimum Internal Controls Standards in compliance with the Tribal-State Compact and Minimum Internal Control recommendations from NIGC that best protect the assets of the Tribe. The *Primary Regulators* of the Tribe need to be fully recognized as being best suited to determine the level of compliance to protect tribal assets.

CFR 25 Part 573 Enforcement

We would urge NIGC to develop a policy that allows NIGC to withdraw an NOV. Should new information come to light, an issue was timely resolved, or the NOV was issued in error, the NOV being withdrawn would be in the best interest of dealing with Tribes in good faith.

On behalf of the members of the Nisqually Tribal Gaming Commission, thank you in advance for the opportunity to submit comments during this consultation period.

Respectfully,

A handwritten signature in cursive script that reads "Inez Dovey Slape".

Inez Dovey Slape
Chair