

Chairman
Eugene Lujan

Vice Chairman
Tanya Chino

Secretary/Treasurer
Kenneth Paquin



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In reply, refer to: EL/067/0211

February 9, 2011

Tracy Stevens, Chairwoman
National Indian Gaming Commission
1441 1 St. NW, Ste 9100
Washington, DC 20005

VIA Email: reg.review@nigc.gov

Re: Notice of Inquiry – Comments on Proposed revisions to the NIGC MICS

Dear Chairwoman,

Thank you for the opportunity to submit our comments for the proposed revisions regarding the NIGC MICS. Our comments are regarding section: 542.41 are the following:

The Pueblo of Santa Ana Gaming Commission agrees with the proposed revision listed below. As the current requirement reads it appears that a dedicated individual is required to oversee the process which in our case is costly and with the utilization of dedicated Surveillance recording the process it deems unnecessary.

(6) If currency counters are utilized and the count room table is used only to empty boxes and sort/stack contents, a count team member shall be able to observe the loading and unloading of all currency at the currency counter, including rejected currency. **The count team member operating the currency counter does not need to be monitored by another count team member if an individual independent of the count process monitors the operator of the currency counter for a minimum of one hour during the count process from recorded or live surveillance at least monthly. The date, time, and results of the independent observation shall be documented.**

Justification: The standard is intended to provide clarification of the count process and the verification of placing currency in and removing from the currency counting devices.

Comment (October): Include a provision that the independent observation will be unannounced.

Response: Agree.

Thank you for your time and if you would like to discuss this further, please feel free to contact me at: eugene.lujan@santaana-nsn.gov or by phone at 505-867-3489.

Sincerely,



Eugene Lujan
PSAGRC Chairman

/gjc

cc: K. Paquin, PSAGRC Commissioner
T. Chino, PSAGRC Commissioner
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