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December 9, 2011

VIA EMAIL TO: reg.review@nigc.gov

Chairwoman Tracie Stevens
National Indian Gaming Commission
1441 L. Street, Suite 9100
Washington, D.C. 20005

RE: Preliminary Draft Changes to 25 C.F.R. Parts 514 and 523

Dear Chairwoman Stevens:

In response to the National Indian Gaming Commission's ("NIGC") request for comments to the preliminary draft changes to 25 C.F.R. Parts 514 and 523, the Cheyenne and Arapaho Tribes of Oklahoma ("Tribes") hereby submit the following recommendations:

NIGC's proposal to use each gaming operation's fiscal year for the calculation of fees, rather than a calendar year, is acceptable. We also do not oppose NIGC's proposal to receive each gaming operation's statements showing its assessable gross revenue for the previous fiscal year on a quarterly basis. The proposed fee structure outlining the process the NIGC will follow in the event of a late fee payment is reasonable.

The Tribes recommend a second notice requirement be included during the 90 days prior to the time the NIGC may issue a finding of failure to pay the annual fee, the notice of violation, and the simultaneous or subsequent temporary closure order.

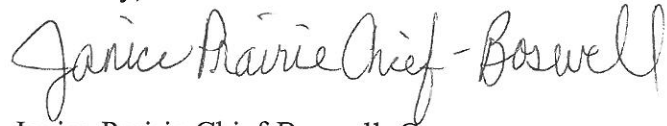
The Tribes oppose the imposition of separate fingerprint fees largely because the NIGC already requires gaming operations pay annual fees. The fingerprinting fees should be covered by the annual fee.

The Cheyenne and Arapaho Tribes does not have a position on the proposed change to 25 C.F.R. § 523, because that section is not applicable to the Tribes since our Gaming Ordinance was not adopted prior to February 22, 1993 and was already submitted to the Chair.

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We appreciate the NIGC's commitment to Executive Orders 13563 and 13175 and consideration of our comments to the preliminary draft changes to 25 C.F.R. Parts 514 and 523. We look forward to additional opportunities to comment at the proposed rule phase.

Sincerely,

A handwritten signature in cursive script that reads "Janice Prairie Chief-Boswell". The signature is written in black ink and is positioned above the printed name.

Janice Prairie Chief-Boswell, Governor
Cheyenne and Arapaho Tribes of Oklahoma

cc: Walter Hamilton, Chairman, Cheyenne and Arapaho Gaming Commission (via email)