



**Gaming  
Commission**

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From:  
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To:  
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[Reg.review@nigc.gov](mailto:Reg.review@nigc.gov)

August 15, 2012

Dear Chairwoman Stevens:

On behalf of the Sault Ste. Marie Tribe of Chippewa Indians Gaming Commission, I am submitting comments to the Part 543 and Part 547 Proposed Rules.

On April 27, 2012, the Tribe submitted comments regarding the Proposed Drafts of Part 543 and Part 547. Overall, our concerns regarding Part 543 remain largely unchanged: It is the Tribe's understanding that the NIGC worked with information and language provided by the Tribal Gaming Working Group (which we heartily applaud), but unfortunately, used it in piecemeal fashion, often out of context, creating proposed regulations that are often not practical or do not make sense. We are submitting detailed comments and specific language that can be used in place of some portions of Part 543. Our greatest concern regarding Part 547, are the grandfather provisions. In short, the proposed language can easily be interpreted to require all grandfathered Class II gaming systems to be removed from operation by November 10, 2013. Although the August 7, 2013 Bulletin assures us that this is not the intent of the NIGC, it does not change the impact the actual proposed language will have upon the Indian gaming industry.

As it was with our April 27, 2012 comments, my Tribe has worked with the Tribal Gaming Working Group in the review of Part 543 and Part 547, and the comments below reflect this collaboration. If you have any questions regarding

these comments, please feel free to contact me at [kermatinger@saulttribe.net](mailto:kermatinger@saulttribe.net) or at (906) 635-7018.

Sincerely,



Kenneth J. Ermatinger  
Executive Director  
Sault Ste. Marie Tribe of Chippewa Indians  
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