



From:
Chairman Joseph V. Eitrem
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To:
National Indian Gaming Commission
Attn: Regulatory Review
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April 27, 2012

Dear Chairwoman:

On behalf of the Sault Ste. Marie Tribe of Chippewa Indians, and on behalf of its more than 40,000 enrolled tribal members, I am submitting comments to the Part 543 and Part 547 discussion drafts. As Tribal Chairman with a close, "hands on", working relationship with the Tribal Gaming Commission, I am knowledgeable of the likely impacts the proposed language will have on my Tribe and on our Tribal Gaming Operations. Furthermore, in the review of these Parts, my Tribe has worked with other Tribes and the comments reflect such a relationship. The comments also reflect a strong support of the comments provided by the NIGC Tribal Advisory Committee. If you have any questions regarding these comments, please feel free to contact me or Kenneth J. Ermatinger, Executive Director of the Sault Ste. Marie Tribe of Chippewa Indians Gaming Commission, at kermatinger@saulttribe.net at, (906) 635-7018.

Sincerely,

Joseph V. Eitrem
Chairman
Sault Ste. Marie Tribe of Chippewa Indians

Part 547

547.1 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.2

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for "Account access component" through "Audit Mode" definitions.

- As per "Agent", we recommend the following language: "A person authorized by the gaming operation, as approved by the TGRA, to make decisions or perform tasks or actions on behalf of the gaming operation. Please note, however, as per Part 543 only, the definition permits the use of computer applications to perform the function(s) of an agent." The language we recommend accounts for the inconsistencies between the two parts for this definition.

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for "Cancel credit" definition.

- As per, "Cashless system" definition, we recommend the term "proprietary" be removed. The term is not used elsewhere.

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for "Cashless transaction" through "DVD" definitions.

- As per, "EPROM", we recommend the following: "Erasable Programmable Read-Only Memory – a non-volatile storage area that may be filled with data and information, that once written is not modifiable, and that is retained even if there is no power applied to the machine."

- As per, "Electromagnetic interference" we recommend the following definition: "(EMI) is the disruption of operation of an electronic device when it is in the vicinity of an electromagnetic field (EM field) in the radio frequency (RF)."

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for "Fault" through "Modification" definitions.

- As per, "Non-cashable credit", we recommend the following: "...an Class II gaming system..." to "...a Class II gaming system..."

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for "Patron" through "Progressive prize" definitions.

- As per, "Proprietary Class II System Component", we recommend the following: Remove the term. In practical terms, it is nonsensical. Operators and manufacturers throughout the industry integrate and support a multitude of components including those developed outside of the gaming industry. For instance, a gaming manufacturer may use Microsoft Windows as a base operating system on a Class II System. Additionally, the term "proprietary" is not used elsewhere.

- The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language for the "Random number generator (RNG)" through "Voucher" definitions.

- As per, "Voucher system", we recommend: Remove the word "proprietary" (it is not used elsewhere) and keep, "system or an external".

547.3(a) Change to: "These are minimum standards and, recognizing that TGRA is the primary regulator of Class II gaming, and nothing in this part shall be construed to diminish TGRA authority, a TGRA may establish and implement additional technical standards that are consistent with the standards set out in this Part."

547.3(b) – 547.3(d) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.4(a) Add a comma between "TGRA" and "the manufacturer".

547.4(b) – 547.4(d) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(a) Change to: "Grandfathered Gaming systems: For all Class II gaming systems that were manufactured or placed in a tribal facility on or before the effective date of this part of the TGRA must:"

- We take out, "...available for use..." because it could unfairly prevent one operator from using a game they didn't have on the floor for play that another operator could use because it was "in use" and this would cause an unfair competitive advantage. This is particularly significant for those tribes that didn't have a Class II gaming operation established before the effective date.

547.5(a)(1) Change to: "(1) Require that all Class II gaming system software that affects the play of the Class II game be submitted, together with the signature verification required by Section 547.8(f), to a testing laboratory recognized pursuant to paragraph (f) of this section within 120 days after the effective date of this part.

Add: 547.5(a)(1)(i) Nothing in this rule is intended to prohibit the continued use of any Class II Gaming component that was previously certified against the current or any pre-existing Part 547 technical standards or judicial ruling.”

Changes recommended to 547.5(a)(1) and the addition of 547.5(i) are made because of the following:

- We are concerned that current certifications (grandfather and technical standards in full) would be invalidated and suggest the change in wording to ensure that modified technical standards in this document would apply only to Class II gaming system components submitted after the effective date of this document.

- The language proposed by the NIGC draft, excludes and attempts to invalidate court decisions that allowed use of certain games. These standards nor the NIGC should be able to overturn a judicial decision of a federal court.

- It is impossible for anyone to meet the requirement proposed by the NIGC draft language because they can no longer be achieved since the time has passed. Though there are many valid arguments on issues with the grandfather provision (see below), but this is the most significant justification that this section must be changed.

- Because there are changes within the previously mandated grandfather provisions the NIGC proposed, technical standard would impose new rules on previously certified grandfather products, therefore invalidating those certifications.

- The proposed language of the NIGC would result in a rule that is inconsistent with how governments with other industry are treated; no one else requires another industry to remove all previously manufactured products from the field unless the perceived flaw or defect in a product poses danger to a user.

- Legacy equipment should not be needlessly rendered obsolete, especially those that have been subject to judicial decisions, by operation of this regulation as proposed by the language of the NIGC.

- The proposed NIGC language adds new requirements for the grandfathered system that could not have been anticipated by the deadlines contained in the existing regulation and therefore were not subject to laboratory analysis and testing. By including these new requirements, the regulation will operate to render prior laboratory testing results invalid.

547.5(a)(2) – 547.5(a)(3) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(a)(4) Take out the following proposed language: “If the TGRA did not issue the certificate, or if the testing laboratory found that the Class II gaming system is not compliant with Section 547.4(a), Section 547.8(b), Section 547.8(f) 547.14, or any other technical standards adopted by the TGRA, then the gaming system must immediately be removed from play and not be utilized.” The proposed language is only applicable during the original initiative to grandfather games. Any class II game submitted under this current document could not be placed into play without the required tests and certifications.

547.5(a)(5) – 547.5(b) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(b)(1) Change to: “Grandfathered Class II gaming systems may be made available for public play once certified or until TGRA withdraws certification.”

- The Sault Ste. Marie Tribe of Chippewa Indians believe that any class II gaming system component that has previously been certified or validated through judicial proceeding should remain available for use by Tribes as they deem warranted for their specific operations. Eliminating these components from Tribes current or potential future operations could create competitive imbalances and financial hardships. This is critical to the long-term viability of Class II gaming. To ensure good-faith negotiations the Tribes have to have leverage and these games help provide that.

- Grandfathering mattered because games that were considered Class II in disputes with states regarding what is covered or not covered in a compact; grandfathering and court decisions protected those games for Indian Country when dealing with other governments.

- The rule that would be imposed via the proposed NIGC language, is inconsistent with how the federal government works with other industries. Federal agencies do not generally require an entire industry to remove all previously manufactured products from the field without legislative action unless a flaw or defect in a product poses danger to the user. An example is when changes in seat belt laws were mandated for cars manufactured prior to the effective date of the law were not required to comply. The regulation was applied only to cars manufactured after the effective date of the law.

- Legacy equipment should not be needlessly rendered obsolete, especially those that have been subject to judicial decisions, by operation of the regulation which would be created by the proposed NIGC language.

- The proposed NIGC language adds new requirements for the grandfathered system that could not have been anticipated by the deadlines contained in the existing regulation and therefore were not subject to laboratory analysis and testing. By including these new requirements, the regulation will operate to render prior laboratory testing results invalid.

547.5(b)(2) Change the first sentence because it sounds like the TGRA is approving the facility not the Class II gaming system.

547.5(b)(3) Take out: "Grandfathered systems must have the ability to enable or disable remote access, and the default state must be set to disabled." --Although the Sault Ste. Marie Tribe of Chippewa Indians fully supports applying feature constraints for full technical standard compliance, but does not support its application to grandfathered components. See arguments noted above.

547.5(b)(4) – 547.5(c)(3) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(c)(5) – 547.5(e)(1) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(e)(1)(i) The Sault Ste. Marie Tribe does not agree with this language. It is written in such a manner that the regulation is meaningless. The language is far too broad and vague.

547.5(e)(1)(ii) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.5(e)(2)(i) Delete this section.

"547.5(e)(3)(e) Compliance by charitable gaming operations" is mis-numbered in the draft language. It should be "547.5(f) Compliance by charitable gaming operations" and all subsequent language should be re-numbered.

547.6 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.7(a) – 547.7(e) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.7(d) Change "display" to "bear" so that this standard covers hand-held components as well as other components that may not otherwise be able to comply with the "display" requirements. For instance; a label affixed with the serial number and manufacturer date would meet this requirement. Change to: "Player interface. The player interface must bear the serial number and date of manufacture and include a method or means to:"

547.7(e) – 547.7(h) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.7(i) We recommend that "DIP" be defined.

547.7(j) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.7(k) Add: "Further, nothing herein must prohibit or limit the technology utilized to run Class II gaming systems."

547.8(a)-547.8(a)(1) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.8(a)(2)(ii) – 547.8(b) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.8(b)(1) Eliminate the words, "automatic or..." because it can be misunderstood. For example, this language could be construed to prohibit the ability of a Class II game to offer a bonus feature that automatically initiates different or additional rules, which is obviously not the intent of the proposed language.

547.8(b)(2)-547.8(c) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.8(d)(1) The Sault Ste. Marie Tribe of Chippewa Indians does not agree with this proposed language as it limits technology.

547.8(d)(2) – 547.8(d)(3) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.8(f)- 547.8(i)(1) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this proposed language.

547.8(i)(2) "...upon resumption..." is redundant and should be taken out. The words are redundant because they are predicated by 547.8(i) which states, "upon resumption following any interruption..."

547.8(i)(3) – 547.8(l) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.9(a) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.9(b)(1) The Sault Ste. Marie Tribe of Chippewa Indians does not agree with the proposed language.

Specifically, the regulation of a specific number of digits is too limiting. The language should be changed to the following: "Accounting data must be stored in a manner consistent with industry standard."

547.9(b)(2) – 547.9(b)(3) The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.10 Further parameters are necessary to define "critical event". As is, the Tribe does not agree with the proposed language.

547.10(a)(1)(i)-547.10(a)(1)(vii) We recommend that the proposed regulations be taken out of table format and be formatted in the same manner as Part 547 definitions.

547.10(b) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language..

547.10(c)(i)-547.10(c)(iii) We recommend that the proposed regulations be taken out of table format and be formatted in the same manner as Part 547 definitions.

547.11 The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.12 The Sault Ste. Marie Tribe of Chippewa Indians agrees with this language.

547.13(a)The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.13(b)(2)-547.13(d)(4) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.14(a) – 547.14(b)(1) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.14(b)(2) Add, "All tests must meet industry standards."

547.14(c) (1) Please note that given the required skills, data, and knowledge of the algorithm it is possible to predict outcomes. However, the likelihood of anyone having all the required skills and knowledge to make such prediction is not feasible given regulations and industry standards.

547.14(c)(2) – 547.14(e)(4) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.14(e)(5) Change the language to the following: "The Class II gaming system must neither adjust the RNG process or game outcomes based on the history of prizes obtained in previous games nor use any reflexive software or secondary decision that affects the results shown to the player or game outcome. In no event shall the Class II gaming system deprive a player of a prize to which the player is otherwise entitled based on the random outcome of the game. Nothing in this paragraph shall prohibit the use of entertaining displays."

· The above changes are recommended because:

o During consultation in San Diego, California, the NIGC conveyed to Tribes that there was also a concern about "awarding a prize that the player was not otherwise entitled based on the random outcome". Tribes are concerned that once the game is over and the outcome announced that any subsequent actions by the operator are considered promotional giveaway and/or goodwill gestures and not considered "secondary decisions."

547.14(f)(1) – 547.14(f)(3) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.14(f)(4) The proposed NIGC language does not make sense: RNG's are tested to 99% confidence currently across the industry. The proposed language contradicts that standard. The Sault Ste. Marie Tribe of Chippewa Indians recommends that you change the language to: "Use an unbiased algorithm and any detectable bias must be reported to the TGRA."

547.15(a)-547.15(d) The Sault Ste. Marie of Chippewa Indians agrees with the proposed language.

547.15(e)Take out:"Class II gaming systems must have the ability to enable or disable remote access, and the default state must be set to disabled." The Tribe objects to the "...must have the ability..." language on the same grounds as it does, above. Although the Tribe fully supports applying feature constraints for full technical standard compliance, the Tribe does not believe it should be applied to grandfathered components.

547.15(f)-(547.15(g) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.16(a) The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.16(b) The Sault Ste. Marie Tribe of Chippewa Indians notes that if you have to display all of the disclaimers on a small hand-held this requirement created by the proposed NIGC language, could unintentionally eliminate certain technologies. It should be adequate that the Class II gaming system display the information. Allowing the disclaimers to be displayed until they are acknowledged by the players, allows for the game to be presented on an interface device that is not provided by the manufacturer or operator such as a cellular phone. As a result, the Tribe recommends the language be changed to: "Disclaimers. The Class II gaming system must continually display or until acknowledged by the player:"

547.16(b)(1)-547.16(c)The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

547.17 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

Part 543:Overall, the Sault Ste. Marie Tribe of Chippewa Indians finds Part 543 extremely badly written. We strongly recommend that the NIGC reconvene the TAC to write Part 543 in a manner that combines Manual and Electronic Bingo regulations together, as well as the technology used to run them. The "bingo is bingo" concept seems to be lost in the proposed language. It is our understanding that the NIGC worked with information/language provided by the TGWG (which we heartily applaud), but unfortunately, used it in piecemeal fashion, often out of context, creating proposed regulations that are often not practical or make sense. Bottom line: Part 543 needs to be completely re-written.

Below, are some (but, by no means all) specific issues identified by the Tribe:

543.1 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

543.2 The Sault Ste. Marie Tribe of Chippewa Indians agrees with TAC and Tribal representatives of the Tribal Gaming Working Group that:

- "Accounting" is not defined correctly.
- "Agent" doesn't support the use of systems as an agent; agent is now only a "person"; this should be changed to include that a system can act as an agent.
- "Cashless transaction" term is needed for clarification purposes.
- "Complimentary items" term is needed for clarification purposes.
- "Credit line" term is necessary to be added.
- "Gaming Promotion" term needs to add "Class II game play" vs. "game play". Additional work on the term is necessary.
- "Network Communication Equipment" term needs to be changed to reflect the need to secure communication. Use of the term replacing "communication" changes the requirements to be imposed on the "equipment" rather than on the communication. Appropriate changes are necessary.
- "Permanent record" term is needed.
- "Sufficient clarity" term is subjective. Additionally, the term includes reference to 20 frames per second, which is specific technology and could be limiting.
- "Unrestricted patron deposit accounts" term is needed.

543.3 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language.

543.4 The Sault Ste. Marie Tribe of Chippewa Indians agrees with the proposed language with the exception of 543.4(b) "Charitable gaming operations". The following language should be added: "Charitable gaming operations (including those tribal supported charities not necessarily organized under 501(3)(c))....".

543.5 Please note: There is no definition of alternate standard. This could result with wording differences being submitted for variance instead of a significant change in intent and coverage. Additionally, the Tribe does not agree with the proposed language that suggests any procedural change, such as doing something in a different order, requires submission for a variance.

543.7 The Tribe is very concerned that the Manual and Electronic Bingo are separated. Technology used for Manual vs. Electronic Bingo must not be distinguished. Problems will abound, including:

- 543.7(b)(3) Requires number of bingo cards from a system; however, the technical standards do not require number of bingo cards; this should be changed to Amount In to be consistent with Part 547.
- 543.7(c)(2) References \$1200 regarding a payout threshold. This reference should be deleted. Instead a proposal of reference that external regulation should be used, so MICS don't have to change when external regulations change.
- 543.7(c)(3) All objects eligible for the draw are available to be drawn prior to the next draw. This is applicable only to paper bingo.
- 543.7(d)(1)(iv)(E)(3) Requires two agents to validate and verify payout prior to paying; remember, this section is for "electronic bingo"; the language used suggests that two agents must verify and validate EVERY win before it is paid, this would require having two people standing at every player interface to verify every play that included a win. Change the language to require two agents for significant payouts.
- 543.8(b)(5) – (6) refers to inventory and storage of physical bingo cards. Instead of the proposed NIGC language, we recommend that management determine exact procedural requirements based on the specific operation needs and size, such as what is logged and when.

· 543.8(e)(3)(iv)(B) Here, references "interface malfunction...." is being used in the Manual Bingo section....which does not work. Instead of having separate sections, combine the Manual and Electronic Bingo in a manner that is consistent and relevant.

543.7(c)(2)uses specific dollar amounts instead of referencing the external regulation; which causes rework of the MICS when external regulations change versus referencing compliance with the external regulations. Specific dollar amounts should not be used.

543.7(d)(2)(iv)(D)The term "overrides" is vague and should not be used.

543.7(d)(2)(iv)(E) Although this section is for "electronic bingo", it requires two agents to validate and verify payout prior to paying:

· "Validation" term needs to be clarified to indicate verifying the validity of the card. "Verification" needs to be clarified to indicate it is about a winning pattern.

543.7(d)(4)(ii)In regard to the Manual prize payouts....The Tier criteria is different from the definitions of the Tiers. This needs to be rectified. Additionally, change the term, "Class II Gaming System Bingo" to "Class II Gaming System." Moreover, proposed language requires at least two agents verify every bingo pattern before a win is paid, which does not make sense. This needs to be clarified.

543.7(d)(5)(iv) Needs to require a supervisory/management agent. Additionally, the proposed language limits technology by requiring employee signatures, instead of "authorization or signatures". The Tribe does not agree with this language.

543.7(e) Throughout this section, the proposed language references "cash" and "cash equivalent" are used inappropriately: All cash and cash equivalent controls should be in one section and procedures should be in guidance, not in regulation.

543.7(f)(4)(ii) The proposed language does not make sense because it requires multiple agents to verify all software signatures. The Tribe does not agree with this language.

543.7(f)(5) This entire section should not be in this regulation, because it is procedural.

543.8 This Part deals with "Manual Bingo". The proposed NIGC language distinguishes manual and electronic bingo technology, and should never happen. The Sault Ste. Marie Tribe of Chippewa Indians strongly recommends that manual and electronic bingo technology not be distinguished.

543.9(d) The proposed language make specific references....to dollar amounts versus referencing the applicable law; this provides flexibility when laws external to MICs change. The Tribe does not agree with the proposed language.

543.9(f)As per statistical records, the proposed language is not practicable in a busy 24-hour operation.

543.10 (b)The Tribe does not agree with process being set as regulation instead of guidance.

543.10(g)Mostly procedural language and does not belong in regulation. Additionally, subsections (3) and (4) reference specific dollar amounts versus referencing the applicable external law so if that external law ever changes it is automatically accommodated.

543.10(g)(5)covers rules posted in 543.10(f) Confusing. Which version is correct?

543.10(g)(11)Change language to require consistent treatment of promotional and non-promotional funds. Moreover, the Tribe urges the NIGC to utilize the TGWG recommendation of placing all transfers of cash and cash equivalents into a single section.

543.12 The Tribe agrees with the TAC recommendation of deleting "Gaming Promotions" and "Player Tracking" sections completely.

543.13 The Tribe agrees with the TAC recommendation of deleting the Complimentary Services section completely.

543.14 The Tribe would like the "Unrestricted Patron Deposit Account" section put back in.

543.14(a)(2)This conflicts with the definition of "Smart Cards"

543.14(b)(1)is impracticable because it requires every single transaction to have ID presented. Such proposed requirements can limit technology and add to overhead costs unnecessarily.

543.14(b)(4)(iii) Adjustments are not an appropriate example for this section as patron changes to the account.

543.15 This section is not consistent with all other sections which use "Supervision"

543.17 Overall the Tribe does not agree with the proposed language because it is very procedural by department or game type, which does not belong in regulation.

543.17(b) Change "...limit physical access to the count room to count team agents, designated staff, and other authorized agents..." to "...other authorized persons..."

543.17(c) Change, "Controls must be established and procedures implemented to ensure..." to, "Controls must be established and procedures implemented in a manner designed to ensure..."

543.17(d)-543.17(g) The requirement for all drop types should be combined. The NIGC draft has them separated by department or game type, which is confusing.

543.18 The Sault Ste. Marie Tribe of Chippewa Indians recommends the NIGC adopt the TGWG proposal for this section completely.

543.20(a) The proposed language is inconsistent with the treatment of "Supervision" in other sections. Consistency is necessary.

543.20(b) Proposed language contradicts itself. The section is supposed to refer to "physical controls" but goes to "Control of physical and logical..." The Tribe cannot support the proposed language until it is made consistent.

543.20(c) Change the word, "personnel" to "agents"

543.20(e)(2) – (3) Use of the word "systems" vs. "Class II gaming system" makes for confusion. The language should be consistent.

543.20(g)(2) Change the word "personnel" to "agents"

543.20(k)(1)(i) Change "...information technology systems" to "...Class II gaming systems".

543.20(k)(1)(ii) Change "...critical" to "Class II gaming system"

543.20(k)(3) Remove the word "annual"

543.21 "Supervision" section needed.

543.23 "Supervision" section needed.

543.23(b)(2)(ii) – (iii) and 543.23(b)(2)(viii) – (xi) and 543.23(c)(8) are new controls, and need further review.

543.23(b)(2)(iii) "...its independent accountants" should be removed, because it doesn't make practicable sense: ie generally recorded journal entries are not recorded by independent accountants.

543.23(c)(5) Proposed language is redundant. This needs to be removed.

543.23(c)(8) Replace the word "Commission" with "TGRA"

543.23(d) The proposed language in this entire section is confusing and needs further review.

543.24 No "Supervision" section.

543.24(c) Take out the term, "Class II Gaming System Bingo" and replace with "Class II gaming system"