

WINNEBAGO TRIBE OF NEBRASKA

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June 27, 2012

Via Electronic Mail: reg.review@nigc.gov

Ms. Tracie Stevens, Chairwoman
National Indian Gaming Commission
1441 L St. NW, Suite 9100
Washington, DC 20005

Re: Request for Extension of Time to Submit Comments on Proposed Class II Technical Standards.

Dear Chairwoman Stevens:

I am writing on behalf of the Winnebago Tribe of Nebraska to request that the National Indian Gaming Commission ("NIGC") allow an additional thirty days to respond to the Proposed Rule on the Class II Technical Standards, which was published in the Federal Register on June 1, 2012. 77 Fed. Reg. 32465-32481.

In the Proposed Rule, the NIGC is requesting tribal governments to provide specific facts and information relating to the grandfathering provisions, specifically, the "sunset clause" in 547.5(b)(1) of the Proposed Rule. Such data, however, is not centrally accessible to tribal governments. Additional time is needed to ensure that tribal governments can collect and compile accurate facts and information. Given the scope of the Proposed Rule, it is important that the rulemaking process produces a substantial record of factual information concerning affected grandfathered Class II gaming systems.

The NIGC is also requesting an analysis of the specific impacts that its proposed provisions will have on tribal gaming operations. A comprehensive and thorough analysis of the available data is simply not possible within the time frame allowed for comment. The questions raised in the preamble to the Proposed Rule require an in-depth analysis of highly factual data and careful consideration of any unintended consequences that the proposed rule could have on tribal gaming operations and interrelated economies. We believe an extension of the comment period is necessary to ensure that tribal governments have sufficient time to collect, compile and analyze data in a manner that will prove both helpful and useful in the NIGC's deliberation.

For the foregoing reasons, we seek an extension of the comment deadline by thirty days from the current deadline of July 31, 2012. Your consideration of our request for an extension of the comment period is deeply appreciated.

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Sincerely,

John C. Blackhawk, Jr.

John Blackhawk, Chairman
Winnebago Tribe of Nebraska

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C:/Tracie Stevens June 27 2012

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