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NATIONAL INDIAN GAMING COMMISSION MEETING  
TAKEN ON JUNE 11, 2012  
IN OKLAHOMA CITY, OKLAHOMA

APPEARANCES

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Job No. NJ401497  
REPORTED BY: Jean Baysinger, CSR RPR RMR

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2 MR. LITTLE: We are on the record. We  
3 have a transcriptionist named Jean. As we progress  
4 through the discussion for Part 547 and then later  
5 on, Part 543, we're going to ask you to, if you have  
6 a comment, speak into a microphone. Tom Cunningham  
7 will come to you and give you the microphone. Each  
8 time you speak, you're going to need to state your  
9 name and your organization so we have a record of  
10 it, and then you can continue with your comments.

11 We'll do our best to answer all of your -- anything  
12 you ask. If not, we'll get back to you, and then  
13 this transcript will be put on our website shortly.

14 So we're going to pick up with Part 547,  
15 and before we broke, Michael Hoenig walked through  
16 the PowerPoint presentation, and how we will  
17 continue for the remainder of the meeting is we'll  
18 take comments on Part 547. If there's time before  
19 lunch -- we're scheduled to break in an hour for  
20 lunch -- we'll move on to Part 543. If you have  
21 comments, you can make them at any time.

22 I also want to take an opportunity, if  
23 anyone has written comments, if they can't stay here  
24 for the entire day, especially on Part 543, if we  
25 don't get to that this morning, if you would like to

1 make a statement for the record on Part 543, you can  
2 do so at any time. You don't have to wait until  
3 this afternoon because I know many of you have busy  
4 schedules and you may need to leave, so if you would  
5 like to make a comment on either one of those, you  
6 can grab a mike at any time and make that statement,  
7 or if you want to submit a written comment, you can  
8 do so at any time.

9           So at this time, I'll open the floor to  
10 any comments regarding Part 547, or if you have --  
11 if you need some more clarification on the  
12 presentation, now would be a good time to do so.  
13 Once again, state your name and the organization and  
14 speak into a microphone.

15           MS. PETERS: Good morning. I'm Jill  
16 Peters with Comanche Nation Gaming Commission.  
17 First of all, we would like to thank the Chickasaw  
18 Nation for hosting us and having us here today.  
19 Secondly, the Comanche Nation appreciates the open  
20 dialogue that we have with the NIGC for this federal  
21 rule making and also including us in part of the  
22 TAC. We appreciate that very much.

23           We submitted written comments, and we were  
24 happy to see your published draft because you  
25 accepted ten out of our 16 comments. Most of the

1 other ones were pretty livable. One of the ones we  
2 are still going to respond to is the grandfather  
3 clause because I think you said there are seven  
4 questions that need to be answered, so our  
5 commission is going to look at that and get back  
6 with you on the grandfather. If you don't mind, I'm  
7 going to go over the 543.

8 MR. LITTLE: Yes, that's fine. Go ahead.

9 MS. PETERS: Okay. On 543 minimum  
10 internal controls, we had 36 comments. We're  
11 pleased you accepted 14 of those. You did not  
12 accept nine, and I think what was kind of  
13 frustrating for us is you failed to acknowledge 13  
14 of the comments, so we still are not clear on those.  
15 We may want to have dialogue with those 13 that we  
16 did not get a response to.

17 One of the things is the surveillance, the  
18 definition of sufficient clarity, and limits the use  
19 of future technology by defining frames per second.  
20 One of the alternatives that you offered was the  
21 equivalent recording speed, and I think that we  
22 would be fine with that.

23 And then the last one would be the 543.17.  
24 The nation expressed concern about the use of the  
25 defined terms financial instrument storage component

1 and billing meter, suggesting that these terms might  
2 confuse particular technologies, and then you define  
3 additional comments on how the terms might limit the  
4 use of those specific technologies and invited  
5 suggestions for alternative terms, so we will also  
6 be getting back with you on those, so thank you very  
7 much.

8 MS. MURRAY: Miss Peters, do you have a  
9 list of the 13 comments that we did not respond to?

10 MS. PETERS: Yes, I do.

11 MS. MURRAY: If you would provide those to  
12 us, I would be happy to convey those to the  
13 commission and review them to respond.

14 MS. PETERS: Okay. Thank you.

15 MR. LITTLE: All right. Thank you very  
16 much. Any other comments? Next comment on Part  
17 547? Yes, sir.

18 MR. YORK: My name is Steve York, and I'm  
19 the gaming commissioner for Fort Sill Apache Tribe.  
20 I have some written comments that I'll submit. Last  
21 year, on July the 18th of 2011, I submitted a whole  
22 group of questions to Tracie Stevens, who attended a  
23 consultation session, Dan Little here, and Steffani  
24 Cochran concerning a wide range of subjects that  
25 never has been replied to, and I'm going to resubmit

1 those to you again, and I won't bother you about  
2 what the content is. I've sent the copies to  
3 Miss Stevens, and they've never been answered. That  
4 spoke on open, transparent, and accountable. I  
5 haven't seen that terminology from you guys in a  
6 while, so that's the primary reason I submitted  
7 those questions when I thought that we were  
8 transparent and accountable.

9 But my total deal is, you know, and my  
10 question is I go back to the alphabets of Indian  
11 gaming. The alphabets of the Indian gaming are 2701  
12 through 2726, the same number of letters in the  
13 alphabet. Okay? And the way I read it, the NIGC,  
14 one of their principal duties is to monitor, so if I  
15 ask you a question how many Class II gaming  
16 operations are in the United States or in Indian  
17 country, can you give me an exact number of how many  
18 Class II gaming operations there are?

19 MR. LITTLE: Is this a question on 547?

20 MR. YORK: Yeah. It covers 547 and 543.  
21 I mean, if you look at -- if you look at 2704, when  
22 it talks about the commission and some of the duties  
23 and stuff that the commission has, Congress is very  
24 clear about what the NIGC's roles are, and so what  
25 I'm saying to you, one of the specific things in

1 there is to monitor, so if you guys are in charge of  
2 monitoring the deal, just like us in Tribal Gaming  
3 Regulatory Authority, we're to monitor Class II  
4 gaming operations in the state of Oklahoma, so I go  
5 in every day to work or we go in to work every day,  
6 we know how many Class II gaming machines we have on  
7 the floor, how many Class III gaming machines we  
8 have on the floor. If we're dealing cards, we know  
9 how many's there, so, you know, I'm asking how many  
10 Class II gaming operations are in the United States  
11 in Indian country. We've got 28 states.

12 MR. LITTLE: We know how many Class II  
13 systems there are. We know how many Class II gaming  
14 systems or operations there are, if you want us to  
15 provide that information to you.

16 MR. YORK: That's all I'm asking. Can you  
17 tell me how many Class II gaming operations exist in  
18 the United States in Indian country right now? I  
19 mean, you can go back a year. I mean, go back to  
20 your last report and stuff. How many gaming  
21 operations are in the United States?

22 MR. LITTLE: We can get that question, if  
23 you want to submit it in writing. Right now --

24 MR. YORK: I've got it in writing. I'll  
25 give it to you.

1 MR. LITTLE: Okay.

2 MR. YORK: And to go along with that  
3 question, you know, I mean, I'm a person that  
4 believes in laws and regulations, and I have total  
5 respect for the National Indian Gaming Commission,  
6 but like I say, if you guys read the law, and even  
7 if I read this handout material you got here, it  
8 talks about you guys in the consultation process  
9 about going back and looking and adhering to our  
10 standards, the tribe's standards, you know. That's  
11 what it says, but the way I'm reading 547 and 543,  
12 we're totally ignoring what that is because we're  
13 allowed to correct 547 to begin with. We shouldn't  
14 have allowed that to happen, but it happened. Does  
15 that give you precedence over our responsibility in  
16 Indian gaming?

17 The way I read Indian gaming, it  
18 specifically says if the state allows Class II  
19 gaming -- it doesn't say Class II gaming, but if the  
20 state allows gaming, then we are the tribal  
21 jurisdiction over that gaming, not the NIGC. That's  
22 what the law says, so if I develop my own technical  
23 standards underneath this 547, it says I've got to  
24 now submit my technical standard to you or to the  
25 chairperson, and she can either approve it or



1 disapprove it, but if my technical standards meet  
2 the law and she disapproves it, where do we go for a  
3 remedy besides the appeal process? The only place  
4 we can go is to court.

5 I mean, no different than the Colorado  
6 Indian River Tribe. Colorado Indian River Tribe  
7 said you don't have any jurisdiction in Class III.  
8 At that time, I was working for the NIGC. I knew  
9 that we never had authority in Class III because  
10 that's what the law read, and I didn't disagree with  
11 it at all, but the Court come out and ruled, and I  
12 told Chairman Hogan at the time, "You need to appeal  
13 it if you don't believe in it." He didn't appeal  
14 it, so it's applicable to all tribes across the  
15 nation in Indian country, so we don't have any  
16 authority to Class III.

17 And then the other one is, is if your job  
18 is to investigate, then you didn't tell me how many  
19 Class II gaming operations there are in existence.  
20 Even though your principal job is to audit, you  
21 should be able to tell me how many Class II games  
22 are in existence in Indian country today, or last  
23 year, the exact number. Alls I'm doing is just  
24 reading what the law says to me, and I'm not trying  
25 to be, you know, anything about it. I'm just saying

1 what the law says and what the job is, and if you're  
2 doing investigations, how many Class II operations  
3 did you audit last year, total Class II audits? I'm  
4 not talking about MICS audits on Class III, but how  
5 many Class II MICS audits were done, and I  
6 understand you can't go down to Mississippi and do  
7 them.

8           And then the other thing is, is how many  
9 illegal gaming operations are there in the United  
10 States, Class II gaming operations? I don't see  
11 anything in the press that says that these  
12 operations are illegal. Like I say, I've got all  
13 this in writing, these questions, and since I  
14 submitted those past deals and never received an  
15 answer -- and I didn't push it because I understand  
16 that, you know, limited manpower and stuff, but the  
17 element that you guys got to be careful about is  
18 we've got our fee schedules up to 4076, and I want  
19 to point out to you is you also got another little  
20 deal that you do, and you charged me for an FBI  
21 fingerprint. I can guarantee you if them funds  
22 exist, the 4080 that Congress gave you, what can I  
23 say to you? So, you know, I'm just being  
24 straightforward, and I'll be here for the rest of  
25 the day, but like I say, I want you guys to think

1 about what the law says, you know, because Congress  
2 is very clear.

3 I mean, you got another partial thing that  
4 I was kind of proud of that you guys went in and did  
5 your electrical mechanical definition. Matter of  
6 fact, you've done it three times, but still, that  
7 doesn't fully clarify the difference between Class  
8 II and III. Do you know what needs to be done for  
9 that definition to be clarified, fully clarify the  
10 difference between Class II and III? You just got  
11 to add one thing. You got to add in your electrical  
12 mechanical definition what constitutes a Class III  
13 lottery. Once that happens, then Class II and III  
14 are settled out because everybody knows what a slot  
15 machine is and everybody knows what roulette is.  
16 Everybody knows what dice is, but the only thing  
17 missing of it, you got timely suspension taken care  
18 of in your definition, but you need to fully clarify  
19 it.

20 And I understand you guys say, "Well, we  
21 can't do that. Congress says everything else is  
22 Class III," but the way I see it, that doesn't  
23 restrict me from writing a technical standard that  
24 says, "This is the definition of a Class III  
25 lottery," so I can tell the manufacturers out there

1 if they submit anything that meets that definition,  
2 it's not a viable Class II game, so like I say, I  
3 just want to provoke a little thought for you, and I  
4 will submit my questions to this committee.

5 MR. LITTLE: Thank you. Is there another  
6 comment on Part 547?

7 MS. GREEN: On behalf of the Creek Nation,  
8 we have a few comments. Nancy Green, Green Law  
9 Firm. Just a few comments on behalf of the Muscogee  
10 Creek Nation. You know, first, I think that the  
11 nation would like to convey just their thanks and  
12 appreciation for the consideration of everyone's  
13 comments and the fact that, obviously, some of those  
14 changes have been made. We appreciate the fact that  
15 the regulation is going to be much better.

16 You know, the primary comments, and there  
17 will be written comments later, is, of course,  
18 regarding the grandfather provisions. I think, you  
19 know, it has to be said that, first, we disagree  
20 with the whole premise that, you know, a whole group  
21 of games are just a wholesale recall of those games,  
22 and we believe that maybe there's some authority,  
23 and it might be under contract law. We recognize  
24 that it's there, and we would like to, in our  
25 written comments, submit to you some answers to the

1 questions that you pose regarding, you know,  
2 primarily lasting impact to gaming. I think it will  
3 be significant.

4 At this point, we've estimated, and I  
5 believe there's other groups out there working  
6 together, but, you know, approximately 32 percent of  
7 games that are on our floor will be impacted, and  
8 again, we've not pulled together numbers, but that  
9 information will be forthcoming. I think it will be  
10 surprising to you, and, really, everyone else once  
11 those numbers get put together how huge that's  
12 really going to be.

13 You know, in regard to the question  
14 about -- your question about, you know, what if we  
15 modified those games as they, you know, needed work  
16 or -- you know, so that at the time that they had to  
17 be repaired, they would just be brought up to date  
18 in sort of a process by which, you know, at some  
19 point, they would all ideally, you know, meet the  
20 new standards and be on the floor.

21 I really -- I mean, that sounds great in  
22 theory. I think the problem with that's going to be  
23 that it's not feasible to modify these games even if  
24 we're doing one or two games here and there. I  
25 think you're going to find that, you know, they're

1 not going to be able to be modified in regard to  
2 some. You know, we are talking about different  
3 vendors and different games, but I don't think it's  
4 feasible, and, you know, and I don't think in the  
5 end that even some of it's even possible, really,  
6 without just recreating a whole new system and a  
7 whole new gaming, at which point we've sort of  
8 defeated the purpose, and then, you know, further,  
9 there are some other comments.

10           You know, we have an objection to the fact  
11 that the regulations -- and this is to 543 in the  
12 gaming promotion regulations. We feel that's  
13 outside the scope of NIGC. I can see you're not  
14 shocked or surprised. Maybe you've heard that.  
15 Well, at any rate, so we -- we, of course, reserve  
16 our opportunity and, hopefully, provide comments  
17 that are responsive to the questions that you've  
18 posed, and hopefully, at the end of this process,  
19 we'll have a better idea of what the impact may be  
20 on gaming if we keep the grandfather privilege.  
21 Thank you.

22           MS. MURRAY: Thank you very much for your  
23 comment, Miss Green. I wanted to address what you  
24 were saying about the potential modification  
25 problems, and I really appreciate that particular

1 comment because those are the types of answers that  
2 we are looking for. That's why we're posing these  
3 questions, is so that if there are problems with  
4 these potential modifications to the grandfather  
5 clause, that we know that, so we look forward to  
6 receiving Creek Nation's comments, as well as  
7 everyone else's, and getting answers to those  
8 questions. Thank you.

9 MS. LASH: Robin Lash, Miami Tribe. I'd  
10 like to thank you also for being here and providing  
11 an opportunity for the Oklahoma tribes to address  
12 you on these important issues, and on behalf of the  
13 Miami Tribe, the tribe is still in the strong  
14 position concerning 547 that the grandfather  
15 provision be extended, that the sunset clause be  
16 removed.

17 The issue that we have for the tribe, we  
18 have probably 90 percent of our floor are  
19 grandfathered systems, and I know that you're asking  
20 for specifics on cost, and we lease the equipment,  
21 but when you ask for modifications and equipment  
22 upgrades, those costs always get passed on to the  
23 tribe. In addition, when systems are put down or  
24 shut down for the changes, you know, our floors are  
25 not bringing in money, either, so there is a direct

1 impact on tribes when you're looking at  
2 modification.

3 Speaking for Rocket Gaming Systems, as  
4 part of the Miami Tribe, currently, Rocket has 4,000  
5 grandfathered systems on the floor and 2,500 units  
6 in storage, and those 2,500 were not submitted for  
7 grandfather, so when you ask whether it would be  
8 beneficial to have a new -- you know, another  
9 provision to allow for grandfathering, specific for  
10 this manufacturer, the manufacturer would consider  
11 submitting the 2,500 boxes that were not submitted  
12 previously. Overall with your question, can they be  
13 upgraded, the opinion from our manufacturer is no.

14 These are very basic systems. The Rocket  
15 classic system is an older system. It's a basic  
16 system, and it is just not cost-feasible to upgrade  
17 it, so that if you look at the 6,500 boxes that this  
18 involves, you're looking at a 39 million dollar  
19 impact to the business of the Miami Tribe if these  
20 are removed from the floor and not used and  
21 grandfathered, and I think it's important to  
22 remember that, again, these are valid Class II  
23 systems. An arbitrary date set by the NIGC to  
24 remove these from the floor does not make sense.

25 I think it's a sovereign right for the



1 tribes to have the systems that they choose on the  
2 floor. The older systems do make sense for the  
3 tribes that are in remote locations and maybe only  
4 bring in eight dollars a day on a game. They can't  
5 afford to have new \$14,000 boxes in their facility.  
6 They don't have backup cost. They just need a means  
7 to bring in a basic amount of money to assist their  
8 tribes, and these older systems provide those means  
9 for these smaller tribes in these remote locations,  
10 so I think it's important to keep that in mind, too.  
11 Thank you.

12 MR. LITTLE: Thank you, Robin. When we  
13 talk about -- and thanks for giving us your  
14 specifics. When we talk about the whole idea of  
15 modifications, I think the idea was that, say, for  
16 instance, if the data storage hardware went bad,  
17 that in lieu of replacing that data storage with a  
18 older, you know, piece of hardware, that it be  
19 modified to a fully compliant piece of hardware.  
20 That was the thought on that. It would only -- it  
21 would only take effect when something broke. It  
22 wouldn't be a requirement that it had to be put in  
23 there.

24 We do hear often that a lot of these  
25 systems are modified and modified repeatedly, and

1 the thought was that perhaps they could be modified  
2 when there's a modification. If there's ability to,  
3 you know, modify it with a fully compliant part or  
4 whatever, that that take place. That was the  
5 thought. I can provide you with information.

6 The other comment I want to just respond  
7 to is the -- I'm not quite sure. The 120-day  
8 submission for the devices or systems, is there a  
9 particular -- we don't know if this is a widespread  
10 problem. When you say there are 2,500, are these  
11 boxes or gaming systems or --

12 MS. LASH: Boxes.

13 MR. LITTLE: Boxes. Okay. If there is a  
14 particular -- I mean, if this is widespread, if it's  
15 very specific, and what I think I'd be interested in  
16 is should there be like a one-time get-these-all-in-  
17 right-now and that's it, or is it just something  
18 that, if we were to make any future modification to  
19 be fully compliant, would it even matter with these,  
20 so those are some of the things that we're trying to  
21 understand and be helpful, and I'm not asking for  
22 you to respond right now.

23 If anybody can, you know, provide some  
24 more information, you know, why wasn't the 120-day  
25 notice met, it could be that that was a short period

1 of time. I don't know, and as we deliberated, we  
2 kind of looked back in the past, you know, records  
3 of the commission to try and establish how that was  
4 set, the reason for that, the reasoning for the  
5 five-year sunset provision, why was that set.

6 When we did have some discussions, we did  
7 get a comment that I think most folks thought the  
8 five-year period is what the normal market would  
9 have, you know, pushed these systems through.

10 However, I'm not sure if the commission really took  
11 into account the economics that we've all been  
12 through in the last five years, so if anybody can  
13 provide some information on what was the five-year  
14 time, the logic and reasoning behind this five-year  
15 provision, it would be very helpful to the  
16 commission. As always, thank you for your -- oh, do  
17 you have some --

18 MS. LASH: I do. One follow-up comment.

19 MR. LITTLE: Oh, hold on. He's got a mike  
20 for you.

21 MS. LASH: Just one additional point about  
22 the cost to the tribes. If you are upgrading, if  
23 you're modifying and you have to shut your floor  
24 down for that, you could have a third of your floor  
25 shut down and no income coming into the tribe while

1 it takes perhaps three days to perform an upgrade or  
2 a modification, so there is going to be a financial  
3 impact on the tribes.

4 MR. LITTLE: Okay. Thank you very much.  
5 State your name and the organization.

6 MR. HUMMINGBIRD: Jamie Hummingbird,  
7 director of gaming commission for Cherokee Nation.  
8 If I might begin just by also thanking Governor  
9 Anoatubby and the Chickasaw Nation for allowing us  
10 into their home, and I also want to thank the NIGC  
11 board for taking time to listen to the many comments  
12 that hopefully will help shape the future of our  
13 regulations.

14 Let me just offer a couple of statements,  
15 one being that in my spare time, I also serve as the  
16 chairman of the National Tribe of Gaming  
17 Commissioners/Regulators Association. In our last  
18 meeting that we held back in the spring, the NTGCR  
19 took a resolution up and passed it by a majority of  
20 the membership there in support of the work product  
21 that was produced by the Tribal Gaming Working  
22 Group, and when I went into my reading of both 543  
23 and 547, I saw that there were some things that were  
24 taken into account, but there's a number of things I  
25 did not see taken into account.

1           Most glaring and what's probably been most  
2 of the subject of today's discussion is the  
3 grandfather clause, and being on the committee that  
4 was seated at the time that these technical  
5 standards were drafted, I can say that as we were  
6 going through there, and to kind of reiterate what  
7 both Nancy and Robin have said, is that the advisory  
8 committee that was in place at the time objected to  
9 the institution of the grandfather clause as well as  
10 the 120-day submission time frame simply because  
11 there was no basis, no logical basis given to us at  
12 the time as to why we had to have a five-year  
13 moratorium, if you will, or a five-year deadline in  
14 order to change out our machines or why we had to  
15 submit everything that we -- all of us had  
16 individually to a lab certification.

17           It was noted at the time in our objection  
18 that the tribal members of the advisory committee  
19 felt that the imposition of those requirements was  
20 arbitrary and without any support, so hearing today,  
21 however, that NIGC is still open to deciding whether  
22 or not those two provisions need to remain within  
23 this document gives me a little encouragement simply  
24 because, as both Nancy and Robin have pointed out,  
25 this is going to have a significant impact on our

1 operations because, as a Class II operation, we're  
2 talking about a Class II system. We're not talking  
3 about individual games, so when you take a system  
4 down, you take all games down, so it's all or none.  
5 We can't say, "Yes, that's fine," and go to the next  
6 and finish up however many thousands of machines  
7 happen to be sitting on our floors just in Oklahoma,  
8 let alone what happens nationwide.

9           And this expense is not going to be just  
10 in lost revenue, but an expense that's going to be  
11 incurred by the vendors to get their products up to  
12 spec, and it is not going to be endured by them.  
13 Our history tells us those expenses are going to be  
14 passed on to the tribe in one form or another, so  
15 not only will we be losing revenue, but we also will  
16 be paying for upgrades to the vendors, so it is very  
17 important for us, and I think you'll see those  
18 numbers come out when you do get written comments  
19 back, and I appreciate you outlining some of the  
20 questions that you are looking to have answered  
21 because I think you will get clear answers for those  
22 questions, and once you see that data, I believe  
23 you'll be able to come to a realistic conclusion  
24 that the imposition of those two provisions needs to  
25 be removed simply because of the impact, significant

1 impact, I would say, it's going to have on our  
2 tribal operations.

3           The other thing I would like to offer up  
4 is one of the things that have been suggested  
5 through the TDWG was -- and this comment also  
6 applies to 543, so forgive me if I jump ahead, but  
7 looking at the document that we had, it is more  
8 procedural-driven, it seems, in parts than  
9 goal-oriented. I get the same criticisms from my  
10 operations, so I'm not saying anything that nobody  
11 hasn't heard before, but in looking at a federal  
12 mandate for a particular step to be followed from A,  
13 B, C, D, E, F, and G, it becomes a little bit more  
14 difficult for us to apply that one-size-fits-all  
15 type approach to our operations, and if we were to  
16 get to be more goal-centric and less  
17 objective-centric, I think that would provide the  
18 tribal gaming regulatory agencies the flexibility  
19 and the structure, if you will, to design our own  
20 systems coming into compliance with the overall  
21 ruling, and I think that, too, is also consistent  
22 with the president's executive order, that is, to  
23 look to the tribes to set their own rules.

24           And what we do here in Oklahoma -- what I  
25 do in the Cherokee operation is different than what

1 Robin does, what Matt does, and everybody else in  
2 the state has some unique characteristic about them.  
3 The vast majority of our operations and our rules  
4 and regulations will be the same, but there are some  
5 differences that we have within our own tribes that  
6 speak to the need for us to design something that  
7 fits us rather than us trying to conform to  
8 something else, whether that be the use of  
9 technology, whether that be the use of alternative  
10 standards, if you will.

11 It is something that we should be able to  
12 design for ourselves, and we need to have the  
13 flexibility to respond to changes in the gaming  
14 environment, whereas if we had a federally imposed  
15 regulation, we cannot change that without going  
16 through a very cumbersome process, as we have gone  
17 through with this product. It's been a couple of  
18 years in the making. Any new changes a couple years  
19 from now is still going to take a couple of years.

20 Where are we in the meantime? We are a  
21 square peg fitting in a round hole, so if we had the  
22 ability to go through and design our own regulatory  
23 structures when we need to, I believe that would be  
24 something that would be of benefit to regulators  
25 across the country. Thank you.



1           MR. LITTLE: Jamie, thank you for that  
2 comment, and I really enjoy hearing your comments,  
3 and I know all the work that you do with the  
4 National Tribal Gaming Commissioners/Regulators, and  
5 I appreciate all the work that you do. You bring up  
6 a couple of points, and we have tried to identify  
7 areas, and more specifically talking about the Part  
8 543 where the regulations were too specific, and the  
9 staff had some tough meetings where we went through  
10 line by line identifying areas where they needed  
11 to -- you know, it doesn't have to be written in  
12 blue ink. We tried to identify those areas and then  
13 provide basically the minimum standard and provide  
14 the gaming operation the ability to design what  
15 works for their organization.

16           You know, there's areas that we don't  
17 limit the use of technology. We tried to make the  
18 alternative minimum standard section appropriate,  
19 and if there's areas where you think that still  
20 needs to be complete, let us know, but we're not  
21 limiting you if there is an easier process that you  
22 can, you know, submit that doesn't make you jump  
23 through a whole lot of hoops, so if there's areas  
24 where we need to work on that, please let us know,  
25 so -- but I do appreciate your comments and look

1 forward to receiving your comments. Thank you.

2 Is there another comment on Part 547?

3 MS. TAYLOR: Leslie Taylor, elected  
4 secretary of the Delaware Nation, also an attorney  
5 with the Green Law Firm. On behalf of the Delaware  
6 Nation, thank you for allowing us to come to this  
7 process and have this consultation today. Thank you  
8 to the Chickasaw Nation for hosting this, and I'll  
9 be brief about Part 547.

10 You know, the Delaware Nation is a small  
11 tribe. We have about 1,400 members. We have a  
12 small casino. We're working on another casino, but  
13 the truth of the matter is that, like many small  
14 tribes, gaming is what funds our tribal government.  
15 It provides for our schools and provides for our  
16 social services programs, and if you ask us to look  
17 at the financial impact, we're in the process of  
18 tracking that. I think it's safe to say it's  
19 significant. It's so significant that, you know,  
20 we're looking at losing scholarships for kids if we  
21 have to take these games out. You know, Robin Lash  
22 talked about the time they're not on the floor.  
23 That's significant.

24 And what I don't think anyone has said yet  
25 is we have a very specific market in Oklahoma.

1 You've got a certain number of players that are  
2 going to play their certain machine, and that's it.  
3 We take those machines out, we're going to lose that  
4 player, and that's something that's hard to quantify  
5 into a formula to show you. It is what it is. You  
6 may lose those players.

7 I think that what my tribe is most  
8 concerned about is, you know, the initial comments  
9 from the latest draft say that the purpose of the  
10 grandfather provision was to protect the security  
11 and integrity of the Class II gaming systems and  
12 that this grandfather clause was supposed to somehow  
13 play into that. I guess the question from my tribe  
14 is, do you have any evidence or any data that these  
15 grandfathered games would compromise the security  
16 and integrity of any of our casinos?

17 MR. LITTLE: Is that a question?

18 MS. TAYLOR: I think that would be a  
19 question for more than just my tribe, so, you know,  
20 if you're going to make a -- if you're going to  
21 force a provision that would cut the knees off of a  
22 lot of tribes, what would be the reason behind it?

23 MR. LITTLE: You know, that's a very  
24 helpful question, and I thank you for that. I want  
25 to thank you for, you know, while the commission

1 fully understands, it's always good to remind us of  
2 the benefits that Indian gaming has provided to the  
3 community, providing, you know, healthcare and  
4 senior centers and scholarships for the children and  
5 all of the other plethora of, you know, opportunity  
6 provided to your communities. It's always good to  
7 remind us of that. I appreciate that, and I want to  
8 thank you for that.

9 As far as the grandfather provision, there  
10 are some areas that, you know, as far as metering  
11 and, you know, security and things like that that  
12 involve correction. It's what we all do as  
13 regulators. We always try to mitigate risk, so  
14 that's the reason. You know, like I said, we don't  
15 see this huge problem, however, we need to always  
16 make sure that we try to keep it to a minimum.

17 MS. TAYLOR: Now that I've approached you  
18 on that, you said it wasn't a problem.

19 MR. LITTLE: Necessarily a problem, but we  
20 need to always try to mitigate risk.

21 MS. TAYLOR: Thank you. I appreciate it.

22 MR. LITTLE: Thank you very much. Next  
23 comment on Part 547? Mr. Morgan?

24 MR. MORGAN: Matthew Morgan, gaming  
25 commissioner, Chickasaw Nation. Commissioner

1 Little, thank you today for providing us this  
2 opportunity. I have a couple of comments on behalf  
3 of my office, as I've sat around and listened to  
4 some of the discussion, and kind of to follow up on  
5 Miss Taylor's comments, you know, any time we enact  
6 a regulation at a local level, you're always looking  
7 at what the rule is supposed to be in response to,  
8 and it is somewhat difficult to figure out in this  
9 instance what the response is for under a  
10 grandfathering provision.

11 We have a significant amount of games on  
12 our floor, as well, that operate under a  
13 grandfathering system. Not having the data pulled  
14 and fully vetted out, I would venture a guess it's  
15 probably 30, 35 percent of my floor, but, you know,  
16 when we get those numbers nailed down a little bit  
17 more, I'll provide you with some of those numbers,  
18 but it seems strange to me that we're still talking  
19 about this grandfathering and the 120-day  
20 submission.

21 I'm still trying to figure out why you  
22 have this rule, what is it in response to, and why  
23 those dates, you know. 120 days does not make it a  
24 Class II game, and I know you've talked about it's  
25 not a classification, but if I classify a game as a

1 Class II game and it didn't meet the 120-day  
2 submission, I still can't play it under your rules,  
3 so I have a Class II game that's unplayable, so  
4 you've effectively still reached the goal of the  
5 game is not going to make a profit on the floor,  
6 which is probably my next point.

7           Why we don't let the market dictate what  
8 is on the floor? If the grandfathering games are  
9 running the way they're supposed to be running and  
10 there's not an issue with them, I'm not for sure  
11 what the five-year date brings to us when suddenly  
12 there's going to be an issue here that these games  
13 need to be converted over. If they have a market  
14 that's playable and your tribal gaming regulatory  
15 authority is comfortable with that risk and they can  
16 provide you with any type of documentation that  
17 shows it's been to an independent testing lab and  
18 it's met those certain criteria, I'm not for sure  
19 why those games need to leave our floor. Again, as  
20 other speakers have talked about today, that's going  
21 to be a huge impact on tribal governments trying to  
22 go through this process.

23           That is probably my question that I keep  
24 trying to come back to. What is the significance of  
25 those dates and what is the problem we're trying to

1 solve? Thank you.

2 MR. LITTLE: Thanks, Matt, for your  
3 question, and I think we've tried to answer this in  
4 the past. You know, this commission wasn't here  
5 when this regulation was created, and, you know, we  
6 can't -- it wouldn't be a good idea for us to try to  
7 guess on what was the logic and reasoning. What  
8 we've heard from discussions or consultation and  
9 discussion is that they felt -- and this came from  
10 tribal leaders had made comments that -- that the  
11 market would have driven these out within the five  
12 years, and that was the reasoning behind that.

13 Now, it went into effect in 2008, and  
14 these discussions took place in probably 2006, 2007,  
15 and not a situation that folks, you know, knew of  
16 the economic conditions that, you know, was coming  
17 ahead, so that's only kind of guess I can make, but  
18 -- so like I requested earlier is if you can provide  
19 me more information on why or how that five-year  
20 date was created, that would be very helpful, but  
21 I'm asking the question you're asking, basically.

22 MS. LASH: Robin Lash, Miami Tribe. I  
23 guess, you know, I just have a high level of  
24 frustration, and you are aware of this from the  
25 tribal advisory committee, with maintaining a

1 regulation that you can't explain. You know, we've  
2 asked in the past, you know, why this and why that,  
3 and I know it was a different administration, but  
4 this is your opportunity to change something that  
5 was not right in the first place, and it isn't  
6 right, and I know you're asking us for specifics,  
7 and we're going to provide that, you know, but --  
8 and I don't mean to let my frustration show, but  
9 honestly, I mean, if you can't substantiate  
10 something and there's no reason, you know, at your  
11 end why it was initiated, then let's do something  
12 about it.

13 MR. LITTLE: Thank you, Robin. Any other  
14 question on Part 547? You don't have to be at the  
15 table to make a comment if anyone in the audience  
16 wants to speak.

17 Well, we could start on -- we're about ten  
18 minutes from a lunch break. We could start on the  
19 543 presentation, but I'm not sure if we'll get  
20 through it in time. I think we'll let her make --  
21 the vice-chair make some comments, and then we'll  
22 break for lunch early. We'll come back at -- the  
23 schedule says 1:30, and we'll pick up on Part 543.

24 MS. COCHRAN: Well, since Dan has this all  
25 under control, I'm going to go home and be sick. I



1 apologize. I wanted to let you know I wanted to  
2 hear your comments, and I still want to hear your  
3 comments, but I'm not doing probably anybody in the  
4 room nor myself any good by sitting here, so I'm  
5 going to beg your indulgence and I'm going to go  
6 home and get some rest. I look forward to seeing  
7 everybody at the sovereignty symposium, and I will  
8 listen to the transcript, and I'll read the comments  
9 that come in, and I do wish the rest of the  
10 afternoon is productive, and I appreciate the  
11 comments and I look forward to continuing a  
12 dialogue, so I'm going to let the commissioner  
13 handle it and I'm going to call it a day.

14 MR. LITTLE: Thank you, Vice-chair.

15 Okay. I think we will recess until 1:30.  
16 Thank you.

17 (Recessed from 11:48 a.m. to 1:34 p.m.)

18 MR. LITTLE: Good afternoon, everyone. I  
19 want to welcome you back. Let's get started here.

20 Okay. We're going to get started with the  
21 afternoon portion of the agenda for the regulatory  
22 review -- Part 547 and Part 543 of the regulatory  
23 review agenda.

24 Before we broke, we did -- we went through  
25 the 547 presentation and we took comments. A couple

1 things as we -- before we broke we want to clarify,  
2 and I think there was a comment on the need for the  
3 grandfather -- or the regulation, and my comment was  
4 directed towards the commission was not sure of  
5 the -- why the former commission chose five years.

6 We know why there's a need for the  
7 regulation. We know that there's reasoning behind  
8 any regulation. There's limited information to  
9 determine why they set five years, and I can only  
10 allude to what we hear and what we've learned  
11 through comments, but that was what my comment was  
12 directed towards, and I hope it wouldn't be  
13 misconstrued in any other fashion. Sarah wanted to  
14 make one other comment here, so I'll turn it over to  
15 Sarah.

16 MS. MURRAY: Good afternoon. I wanted to,  
17 in some respect, respond to Miss Taylor's question  
18 from earlier today regarding the risk of the  
19 grandfathered games and whether we know -- have a  
20 quantifiable risk associated with those games, and  
21 the answer to that is that we don't always know what  
22 the risk is because our authority is a civil  
23 regulatory authority, which means that we promulgate  
24 regulations, usually, to prevent breaches in  
25 security and laws that protect the integrity of

1 Indian gaming.

2 On the other side of that is a criminal  
3 authority, which we do not have, to deal with actual  
4 theft loss and other compromises in security in  
5 Indian gaming. At that point, the NIGC would not  
6 always be notified or be aware at the level that a  
7 security breach has occurred at an operation or a  
8 tribe. We wouldn't actually get those statistics,  
9 so it would be very difficult for us to know what  
10 the actual risk is unless the operations or the  
11 tribes voluntarily provide us with that information.

12 I also wanted to clarify that the  
13 technical standards in the grandfather clause are --  
14 were created to protect the security integrity of  
15 Class II systems, and the grandfather clause in  
16 particular was created as a mechanism by which  
17 tribes could gradually come into compliance with the  
18 technical standards, and it was designed to mitigate  
19 and potentially eliminate the cost to tribes  
20 because, over the five-year period, it would make it  
21 possible for them to not have to close down their  
22 entire floor at one time to come into compliance.  
23 They would have five years to do that over time.

24 At this time, we're starting to reevaluate  
25 the necessity of the five-year period, the 120-day

1 period, and evaluate what the actual risk is  
2 associated with these grandfathered systems, and  
3 we're very interested in hearing the responses to  
4 the questions that are in our preamble as well as  
5 any supplemental information that tribes or  
6 organizations feel is pertinent to deciding what to  
7 do about the grandfather clause and the five-year  
8 period, generally, so we very much appreciate  
9 everyone's comments, and we look forward to  
10 receiving written comments in response to those  
11 questions. Thank you.

12 MR. LITTLE: Is there any other comments  
13 on 547 before we move to 543? Let's get a  
14 microphone over here, if you can state your name and  
15 organization for the record, please.

16 MR. GREEN: Jess Green, employee of the  
17 Miami Tribe of Oklahoma, and I represent other  
18 tribes, of course. In 1997, litigation started  
19 against these Class II games that you're worried  
20 about and are trying to grandfather -- trying to get  
21 out of existence by the grandfather clause. It was  
22 started by the U.S. Attorney in the Northern  
23 District of Oklahoma, and shortly thereafter, it  
24 started in California. It resulted, in 2000, in the  
25 two Multimedia decisions which say that Class III

1 gaming principles are not equitable to these linked  
2 video games, that they are Class II games, and they  
3 are lawful as Class II.

4 Now, what you're doing with the  
5 grandfather clause is you're causing both of these  
6 federal circuits to task. You got federal judges  
7 that have ruled that these two systems are Class II,  
8 and yet the regs are going to prevent them from  
9 being in play. I don't think federal judges will be  
10 happy with that. I also want to advise you that  
11 that Multimedia system that was litigated is owned  
12 by the Chickasaw Nation, who may at any time start  
13 replaying it, and because the systems and the Rocket  
14 systems are so near the same, they will probably use  
15 those Rocket boxes that are in storage because  
16 they'll be very reasonable to utilize.

17 And if you understand those games, those  
18 games separate money from players at a much slower  
19 rate than most of the Class II games you see today,  
20 but they might be ideal if you're busing people to  
21 bingo halls. I want you to understand that because  
22 bussed people bring about 40 to 60 bucks with them.  
23 They've got about \$20 to play. They usually have  
24 two to three hours from when the bingo session ends  
25 before they leave. Well, they're going to lose

1 their money real quick in a regular gaming facility.  
2 They're just sitting in there taking up space. If  
3 we keep them utilizing these games, they will  
4 entertain them for long periods of time, as these  
5 games have proven they will. These games have a  
6 place as a niche game.

7           You're also, of course, protecting us from  
8 a risk that has never been proven, not in ten years,  
9 but in 15. We haven't had a risk in 15 years over  
10 these Class II link server based games, and the  
11 reason we haven't had a risk is because we pay the  
12 manufacturers a percentage fee, so they watch things  
13 just as close as the tribe. You already have two  
14 people being watch dogs on the games. Anything goes  
15 awry, both the gaming commission, management, and  
16 the manufacturer want to know why the percentages  
17 are off. That's why you haven't had a problem.

18           Again, they're not designed with back  
19 office systems. They're not designed to look into  
20 back office systems because in order to win the  
21 initial litigation, the box had to be dumber than a  
22 post. We had to prove that there was nothing in the  
23 box that could do anything. I mean, Dan, you well  
24 know the game ain't in the box. It's in the server,  
25 and so those games are intentionally, by design, not

1 very smart at the box. Your regulations require  
2 games to be smarter at the box.

3 Now, you've not heard any protest over the  
4 new games that are coming into effect, and again, a  
5 lot of the tribes have required the games that go  
6 into their bigger, more marquee facilities to have  
7 intricate back office systems so they can track  
8 everything, but in our smaller to medium size  
9 facilities, we still use these old boxes, and we use  
10 lots of them, and if you think about it, these  
11 smaller to mid-size facilities are the places where  
12 some of the smaller to mid-size tribes have all  
13 their money.

14 If you cost them more money, if you make a  
15 third of their floor be down three to four days out  
16 of a month, you will destroy their profitability for  
17 that month, and you need to be able to tell them  
18 which government programs they're not going to fund  
19 that month. Are we not going to let the seniors eat  
20 that month? That's the direct impact you're going  
21 to have with this grandfather clause. I appreciate  
22 your listening to an old man's comments. Thank you.

23 MR. LITTLE: Thank you, Jess. I  
24 appreciate your words. I know you've raised the  
25 issue of the court decisions on the games in the

1 past, and we do take those into account, and I know  
2 the legal staff is aware of it, so I do appreciate  
3 that and always appreciate comments that you make.  
4 They're very thoughtful and very well thought out,  
5 so thank you very much.

6 Is there any -- yes, ma'am.

7 MS. COODY: My name is Lottie Coody. I'm  
8 with the Seminole Nation of Oklahoma. I'm the  
9 gaming regulator. I'm sitting here and I'm trying  
10 to play catch-up, and I've been going to these  
11 meetings, and I've listened to everyone making  
12 comments here. I know that it will affect our  
13 casinos because they're very small, and just  
14 thinking about it and talking about dollars and  
15 everything, I'm thinking to myself when those Class  
16 II games go down, we're losing money and we won't  
17 get paid, so I know you depend on our money to pay  
18 for your jobs, so I'm just thinking about that.  
19 Thank you.

20 MR. LITTLE: It's always a good reminder  
21 that -- and I know folks in the audience all know  
22 this, but the agency is fully funded through the fee  
23 assessments that you all pay, and it's a great  
24 responsibility to make sure that we utilize those  
25 resources wisely, so I really appreciate you



1 reminding us of that. Thank you for your comment.

2 Is there any other comments on the Part  
3 547 before we move to the 543 presentation? Okay.  
4 I will turn the microphone over to Jennifer Ward.  
5 She's going to continue the Part 543 presentation.

6 MS. WARD: Good afternoon. Welcome back  
7 from lunch. We're going to dive right into Part 543  
8 here, and unlike 547, since we have a  
9 transcriptionist now, if you have any comment,  
10 please feel free to interrupt me, and quite  
11 literally interrupt me if you need to. I may be  
12 looking down at the paper or up at the screen and  
13 may not see you, so please let me know. Just make  
14 sure that we get a chance to get you on microphone  
15 before you get started too far into your comments.

16 All right. So Part 543. This part  
17 addresses only Class II games and their associated  
18 functions. The proposed rule is based on the  
19 discussion draft, and that was a new document with  
20 ideas and language that we drew from several  
21 sources. Those included the current MICS, the TAC  
22 recommendation, the Tribal Gaming Working Group  
23 guidance, and the 2010 proposed MICS.

24 In this proposed rule, generally we  
25 reviewed the use of "agent," "person," and

1 "personnel" in response to comments, and we made  
2 changes where we felt it was appropriate so that  
3 where it says "agent," "person," or "personnel," we  
4 tried to make sure that it says exactly what we mean  
5 there.

6 We also inserted "as needed" language in  
7 each of the supervision provisions, excepting the IT  
8 section, and this is to promote consistency in the  
9 proposed rule. We also added supervision provisions  
10 for patron deposit accounts, lines of credit, and  
11 surveillance.

12 We changed a few of the definitions in  
13 response to comments. The first has to do with  
14 "drop proceeds" and "drop." The "drop proceeds"  
15 definition has been amended to include the financial  
16 instrument storage component proceeds. Previously,  
17 it only included drop box proceeds, so we included  
18 both of them, and the "drop" definition has been  
19 deleted as unnecessary. The process of collecting  
20 boxes and components is described thoroughly within  
21 that section.

22 The definition of "gaming promotion" has  
23 been altered to include only those promotions that  
24 require game play to participate, and this is the  
25 same as it was in the discussion draft, so there

1 were no changes from the discussion draft to this  
2 one.

3           Similarly, the definition of "sufficient  
4 clarity" continues at 20 frames per second minimum,  
5 but adds "clearly identify" to the requirements, and  
6 the commission invites comments on whether 20 frames  
7 per second or the equivalent will be acceptable to  
8 prevent a limitation on technology. We did receive  
9 a comment today that if we limit it to 20 frames per  
10 second, there may be a limitation on technology if  
11 the technology doesn't use frames per second, so  
12 we're inviting comment on whether the insertion of  
13 "or the equivalent" is acceptable there.

14           Under 543.3, the section on how tribes  
15 comply with this part, these are minimum standards,  
16 and a TGRA may establish additional controls that do  
17 not conflict with this part. The regulations  
18 provide a framework that recognizes the significant  
19 role of TGRAs in regulating gaming, and throughout  
20 this document, the TGRAs establish thresholds for  
21 investigating variances, and they implement  
22 procedures for various standards.

23           There's also 12 months to comply by  
24 establishing and implementing procedures. You have  
25 12 months from the date of the final publication to

1 establish standards, and then you have until the  
2 next fiscal year begins to come into compliance with  
3 those, and the new facilities must be compliant  
4 immediately. Yes?

5 MR. CHRISTENSEN: Bear Christensen with  
6 Cherokee Nation Entertainment. We're going through  
7 the definition sections. You had mentioned agents,  
8 but you didn't mention anything regarding a  
9 definition for the TICS, the internal controls that  
10 are written by the operation, and are -- is that  
11 something that you're planning to leave in the draft  
12 going forward or is that something that is still  
13 open for discussion?

14 Because, you know, one of the feelings I  
15 have on that is that I think that's a big  
16 over-stepping of an NIGC authority to require those  
17 policies and procedures for the individual  
18 operations. I think that's something best left to  
19 the tribal gaming authorities to determine what sort  
20 of controls that they have for their properties  
21 because those properties can be different from site  
22 to site, as well as unique.

23 There's no language within that definition  
24 that addresses what qualifies as a satisfactory TIC,  
25 and what troubles me is the ability stated within

1 the discussion draft for the NIGC to fine an  
2 operation based on that definition.

3 MS. WARD: We might need a follow-up  
4 comment to clarify your question, but continuing  
5 about the definition of this specific internal  
6 control standard is that the tribe's operation is in  
7 conjunction with the security established and  
8 implemented, and you're right. There is nothing  
9 that says what a sufficient or acceptable TICS would  
10 be, and that's by design.

11 We want the flexibility there for each  
12 individual operation and each individual TGRA to be  
13 able to establish their own TICS that meet their  
14 operation's needs, but it is important that each  
15 tribe have those TICS because throughout the MICS,  
16 as you look through it, you'll see that tribes have  
17 to establish thresholds to investigate variances.  
18 They have to, for example, come up with a policy to  
19 make sure that when a kiosk reconciles pull-tabs,  
20 that those are then destroyed in accordance with the  
21 policy, so things like that would be the TICS, and  
22 those do need to be established and maintained.

23 MR. CHRISTENSEN: Right, but why is the  
24 NIGC establishing that? Why isn't it left up to the  
25 individual tribal gaming regulatory authority to do

1 that, and why would the NIGC therefore fine those  
2 operations while not letting the tribal gaming  
3 regulatory do that themselves?

4 MS. WARD: I think we do leave it up to  
5 the tribes unless I'm misunderstanding your comment.  
6 When we require the tribes to establish thresholds,  
7 it's the tribes that are coming up with those. When  
8 we require procedures for security destroying  
9 pull-tabs that are taken from a kiosk, the tribe  
10 comes up with those procedures. We just require  
11 that each individual tribe has those procedures.  
12 You can then determine what that is and what suits  
13 your needs, but we just require that you have them.

14 MR. WEST: I don't know if everybody has  
15 looked at the federal register. That is the current  
16 document that's being published by the commission  
17 for both 547 and 543. I know in some of the last  
18 meetings, some people are looking at the past  
19 discussion drafts and other documents that have been  
20 distributed around, but one of the proposed  
21 standards states that each gaming operation must  
22 develop something that at a minimum comply with the  
23 TICS.

24 It's not the intent to take away any of  
25 the power and approval from the TGRA as far as the

1 TICS that are developed and managed by the gaming  
2 operations, so there's nothing taken away from the  
3 TGRA.

4 MS. WARD: Thank you, Rest. I just also  
5 wanted to clarify that there was some talk of fining  
6 folks about the MICS unless I misunderstood the  
7 comment. We've, as far as I know, never fined  
8 anyone for a MICS violation or issued a violation.  
9 There's never been a notice of violation for a MICS  
10 exception.

11 MR. CHRISTENSEN: For MICS or a TICS?

12 MS. WARD: Either. MICS, really. TICS  
13 are new to this.

14 All right. Also, moving on to 543.4 on  
15 this same slide is the small and charitable  
16 exceptions, and -- oh, Jess, you have a comment.

17 MR. GREEN: I'll allow you to finish it  
18 first.

19 MS. WARD: Okay. The small and charitable  
20 exceptions. Now, the history on this, the  
21 charitable exception came first in 2002 when the  
22 MICS were written, and then later in the next  
23 incarnation of the MICS, there came along the small  
24 gaming operations exception, and as we look through  
25 it now, we're wondering whether a charitable

1 exception is still necessary or whether it's already  
2 encompassed by the small gaming operation exception,  
3 and it's fairly redundant, so we're looking for  
4 comments on that.

5 MR. GREEN: Again, my comment on the  
6 charitable is it is not redundant. It is very  
7 important, and where it becomes important is if  
8 you're actually out there doing the work. Matthew  
9 Morgan regulates -- my name is Jess Green. I'm  
10 employed by the Miami Tribe. I'm a member of the  
11 Green Law Firm, who represents tribes throughout the  
12 nation.

13 But my point is, is that in regard to  
14 charities, that's where you stuff the senior side.  
15 Now, I say stuff because the seniors will operate a  
16 bingo game just before lunch, and if you think  
17 there's any way you can control senior citizens of  
18 any Indian government, you need to tell me how  
19 because I haven't seen anybody be capable of it.

20 They've been running their nickel bingo or  
21 ten-cent bingo game not since IGRA, not since '82,  
22 but ever since they've had a senior site of any  
23 kind, and they jealously guard it. They need their  
24 own exception for us to squeeze them in, and they do  
25 not need to be considered a small operation. They



1 need to have their own category because they do  
2 things in a real unique fashion, and they police  
3 their own work.

4 MS. MURRAY: Thank you, Jess, for your  
5 comment. I think the issue wasn't whether to get  
6 rid of the charitable exception, meaning that you  
7 wouldn't be able, as a charity, to operate under the  
8 exception. It was, rather, whether a small gaming  
9 exception sort of encompassed and could be merged  
10 into one, and whether that was appropriate, or  
11 whether there was some reason why it shouldn't be,  
12 so if that's what your comment is directed toward,  
13 then I appreciate that.

14 MR. GREEN: No, my comment is that we  
15 still need to keep that charitable and put those  
16 seniors in small. A gaming commissioner might want  
17 to exercise some authority because sometimes small  
18 is in the eye of the beholder, and they tend to  
19 grow, and the gaming commissioner may need to have  
20 some authority over them and he might need to  
21 exercise it, but from a practical standpoint, you're  
22 not going to do anything with the seniors. You just  
23 can't.

24 MS. MURRAY: That was the answer that I  
25 was looking for, and I appreciate that comment about

1 why we need -- why we need those exceptions, so  
2 thank you. I appreciate that.

3 MR. LITTLE: And this is one of the  
4 questions that we did ask in the preamble, so, you  
5 know, looking at ways to make -- and these are  
6 minimums to make them continue to be workable. If  
7 this is an area where we could streamline a little  
8 bit, that was the reason behind it, but we weren't  
9 sure, and that's why we asked the question, so thank  
10 you.

11 MS. WARD: Okay. Moving on to 543.5, how  
12 tribes apply to use an alternate standard, and this  
13 is the same thing we talked about in 547, the  
14 alternate standard language versus variance. I  
15 think it was in the TAC when they went through and  
16 there was some discussion about the word "variance"  
17 and how it can be confusing, particularly in the  
18 context of the MICS, where "variance" is used to  
19 describe when you have a value that is different  
20 than what you expected it to be, and here that's not  
21 what we mean.

22 Here we mean the tribe comes up with a  
23 standard that's different from the MICS, so we  
24 changed the language to an "alternate minimum  
25 standard" based on the public comments. There were

1 some comments asking what exactly we meant by  
2 alternate standard, and we wanted to clarify that a  
3 tribe can always implement a standard that's more  
4 stringent than the MICS, but if it wants to  
5 implement a standard that's something different from  
6 the MICS, it requires this procedure where the TGRA  
7 may approve the alternate minimum standard, but they  
8 still have to obtain approval from the NIGC chair.  
9 The NIGC chair then reviews and comes to a decision  
10 within 60 days unless she requests an additional 60  
11 days. Yes, Mr. York?

12 MR. YORK: Yeah. I don't think I need a  
13 microphone. My primary question is, you know, you  
14 guys talk about a minimum like on this one. You  
15 can't have anything less than a minimum. You have  
16 something greater than a minimum. I mean, me and  
17 Jethro Bodine went to the same school. We're both  
18 educated. So how can you talk about having a  
19 minimum, because you either have a standard or you  
20 don't have a standard. You can't create a variance  
21 that's less than a minimum, so it has to be  
22 something that exceeds the minimum. That's the only  
23 thing I'll point out to you. I mean, I'm just  
24 talking about a common understanding of the English  
25 language. You can't have anything less than a

1 minimum.

2 MS. WARD: Thank you for your comment, and  
3 in the standard itself, it explains that it can't be  
4 less than the minimum. You don't -- and you're  
5 correct. You don't require chair approval if it's  
6 more stringent than minimum, but there is a middle  
7 ground where it's different than the minimum, and  
8 that's what we're trying to get to here.

9 MR. YORK: I mean, the only reason I'm  
10 bringing this up is that I come from back in the old  
11 days when Joe Smith was in charge of the division  
12 when he first come out with the MICS in 2002, and by  
13 the time it come out, he'd already changed it by the  
14 time it became published in the regs. I mean, every  
15 time that we see regs published, you know, in the  
16 content that we're looking at, they're already  
17 changed. Somebody in their thinking ability,  
18 basically, will change them things and then try to  
19 tell me like the Colorado Indian River Tribe case  
20 would apply. It's not applicable because you wasn't  
21 part of the lawsuit. Well, that's a bunch of bull,  
22 too, you know.

23 I mean, I'm trying to be honest with you.  
24 If we're going to have a truthful discussion, we  
25 need to talk about it, and I'm going to raise the

1 fact of the TGRA. You keep mentioning the TGRA.  
2 There's nothing in the alphabet of IGRA in 2701  
3 through 2726 that talks about a tribal gaming  
4 regulatory authority. There's nothing in it. The  
5 only thing that happened is the NIGC created this  
6 myth that you need to have an independent gaming  
7 commission and you developed model gaming ordinances  
8 that talked about an independent gaming commission.

9 And I will say this to you, too. If my  
10 tribe decides to do away with the TGRA and the  
11 business committee wants to become the tribal gaming  
12 regulatory authority and they submit that to you,  
13 are you going to approve it? I would say, by law,  
14 you have to. Isn't that correct?

15 MS. WARD: So the question --

16 MR. HOENIG: I'm sorry. I don't think I  
17 understand your question.

18 MR. YORK: I'm saying that in the law, and  
19 I -- it says that the tribes, in their  
20 jurisdiction -- it doesn't talk about a tribal  
21 gaming. It talks about you guys, the chairman of  
22 the National Indian Gaming Commission, approving a  
23 tribal gaming ordinance, but it doesn't say that you  
24 have to have an independent gaming commission.  
25 There's nothing in the law that basically says that.

1 That was just something that was created as the  
2 interpretation of IGRA.

3 One group of gaming commissioners for the  
4 National Indian Gaming Commission said we had to  
5 have an independent tribal gaming regulatory person,  
6 agent, and since then, that myth has been carried on  
7 in the entire process. Even in this process, we're  
8 talking about a tribal gaming regulatory authority,  
9 but underneath the law, there's nothing that  
10 signifies that whatsoever.

11 MS. WARD: Okay. Thank you. In 543.8,  
12 this is a MICS for bingo, and this is a big change  
13 from the discussion draft. Based on many of the  
14 public comments we received, everyone wanted us to  
15 combine manual bingo with gaming system bingo, and  
16 the commission agrees that bingo is bingo and has  
17 combined it into one section. 543.7 is now  
18 reserved, so bingo starts at 543.8.

19 We believe this is less procedural than  
20 the existing MICS, but it requires the TGRA and/or  
21 the operation to establish controls that meet the  
22 detailed criteria, and for an example of some of the  
23 detailed criteria, take a look at 543.8(b)(1) that  
24 discusses the bingo card inventory.

25 There is also a requirement for

1 verification of prizes over \$1,200, and the player  
2 interface may serve as one verifying signature for  
3 manual payouts and may serve as the sole verifying  
4 signature for automatic payouts, and that was  
5 corrected from the discussion draft, where it  
6 appears to be an oversight. We meant to include it  
7 and it didn't get done, so this proposed rule  
8 corrects that and allows for the system itself to be  
9 a verified signature.

10 This received a lot of comments. I'm  
11 going to pause here in case anyone has any comments  
12 or questions on this bingo section.

13 MR. YORK: You need to change it from  
14 manual bingo to paper bingo. I don't know of any  
15 manual bingo games.

16 MS. WARD: Can you repeat it again in the  
17 mike? I could barely hear you up here.

18 MR. YORK: I said you need to change  
19 manual bingo to paper bingo. I don't know of any  
20 manual bingo games.

21 MS. WARD: Okay. I'm being told, and I'm  
22 looking in the regs for confirmation, but I'm being  
23 told that in the regs itself, it doesn't say manual  
24 bingo, so that's something that looks like in the  
25 PowerPoint I need to change, but I'm told that in

1 the regs themselves, it does not say manual anymore.  
2 Okay. So thank you for pointing that out. We'll  
3 change the PowerPoint.

4 In Section 543.9, MICS for pull-tabs, we  
5 have a \$600 or more prize verification threshold,  
6 and we've added the definition of kiosk. It's been  
7 amended to clarify that it may also be capable of  
8 redeeming and reconciling pull-tabs. We received a  
9 comment that talked about kiosks possibly not being  
10 able to dissipate the pull-tabs if they're redeeming  
11 and reconciling them, and we were concerned that  
12 that may limit technology if operations wanted to  
13 use kiosks for this function.

14 MR. YORK: It also limits the game.

15 MS. WARD: Tom, can we get a microphone,  
16 please?

17 MR. YORK: This is Steve York again. A  
18 pull-tab game is basically a pull-tab game. Well,  
19 the funny thing about it, without human  
20 intervention, in other words, you have to have a  
21 bingo game and then you have to be selling pull-tabs  
22 in order to run a pull-tab game, and the pull-tab  
23 game itself, if you're doing it totally automatic,  
24 then it becomes not a Class II game. It becomes a  
25 Class III game, even though itself, it's based on



1 the pull-tab itself, but if you go back and read  
2 originally the law set up on pull-tab underneath 25  
3 CFR, you'll see that you have to have a bingo game  
4 in order to have pull-tab games. It goes back to  
5 the Santee Sioux tribe up in Nebraska.

6 They come in and sue the National Indian  
7 Gaming Commission and say, "Hey, why don't you go  
8 ahead and pull up the tabs they use in there?"  
9 There wasn't nothing wrong with Lucky Tab IIs, but  
10 there was the fact that the Department of Justice  
11 and even the NIGC missed, and that's all they had,  
12 was pull-tab games, and they had to have paper bingo  
13 or an electronic bingo game in order to make it not  
14 a Class III game. That's all I'm saying.

15 So if you allow everybody to cash their  
16 tickets through a pull-tab game through this  
17 particular deal, then you take out the prominent  
18 thing of Class II. You take out the human  
19 intervention that's required to have a Class II  
20 game.

21 MR. HOENIG: Thanks for that comment, and  
22 I'd like to point out again that at the beginning of  
23 the PowerPoint, you know, all these internal  
24 controls are presumed to apply just to Class II  
25 games. These are not classification regulations.

1 These don't in any way try to classify the games as  
2 Class II or Class III. You're right. Class II is  
3 defined in the CFR. That's where the classification  
4 distinctions are going to be made, so this  
5 regulation 543 is presumptive that this is a Class  
6 II game. It's not going to try and classify them  
7 within the regulation.

8 MS. WARD: Do we have any more questions  
9 on the pull-tabs? Okay. Moving on to 543.10, the  
10 MICS for card games, the TGRAs review and approve  
11 cancellation and removal procedures, and this  
12 proposed rule continues the standard that no  
13 administrative or overhead fees may be taken from  
14 player pool funds, and we did receive one comment  
15 that the supervision section in the card games may  
16 not provide for adequate supervision of the card  
17 room, and we request additional comments on whether  
18 the supervision level is effective and adequate.

19 Okay. 543.12, MICS for gaming promotions  
20 and player tracking. The gaming promotion standards  
21 are limited to those promotions that require game  
22 play to participate. So, for example, if you have a  
23 tumbler in the front entryway of your gaming  
24 operation and patrons can come in and drop a card  
25 with their name and contact information in this

1 tumbler for a raffle to be held later, that's not  
2 covered under gaming promotions. Gaming promotions,  
3 under this proposed rule definition, must require  
4 actual game play to participate. They require some  
5 sort of wager, and the section also covers player  
6 tracking systems because player tracking, again,  
7 requires game play to track it.

8 And 543.13, the MICS for complimentary  
9 services and items. The TGRA/operation is to  
10 establish specific controls and procedures, and the  
11 TGRA establishes the threshold for recording comps.  
12 I'm going to pause here because I'm sure we have  
13 some comment on the gaming promotions, player  
14 tracking, and complimentary service items.

15 No? Nothing? Wow. Okay.

16 Moving right on to 543.14, the MICS for  
17 patron deposit accounts and cashless systems. We  
18 removed the reference to unrestricted player  
19 accounts because of the Bank Secrecy Act.

20 In the MICS for lines of credit, it covers  
21 the establishment of lines of credit, and the  
22 commission has heard that this provision may not be  
23 necessary, and we invite specific comment on why  
24 folks think this provision may not be necessary.  
25 We've heard in consultations that there are several

1 tribes that are considering adding lines of credit  
2 to their operation, and others currently offer it,  
3 so we felt it was necessary, but again, interested  
4 in comments if you feel otherwise.

5 543.17, the MICS for drop and count. It's  
6 been simplified as much as drop and count can be  
7 simplified, and it provides for more TGRA and  
8 operation discretion.

9 The MICS for cage, vault, cash, and cash  
10 equivalents and kiosks in 543.18. There is a  
11 provision on the kiosks there, and that was in the  
12 discussion draft. Any cage increase or decrease of  
13 a hundred dollars or more must be verified,  
14 documented, and recorded, and promotional payments  
15 of a hundred dollars or more must be documented.  
16 Those are all unchanged from the discussion draft.

17 In 543.20, the MICS for information  
18 technology and IT data, most of these topics were  
19 adopted from the TAC for guidance, and those include  
20 Class II gaming systems and physical controls. The  
21 list is up there. I'll just highlight a few,  
22 physical and logical security and remote access, and  
23 the rest of those on the list.

24 In this section, we also added a  
25 definition of "system" in the IT section to

1 distinguish it from Class II gaming systems within  
2 the IT section only, and that's based on public  
3 comment where folks were a bit confused as to what  
4 kind of system we were talking about, so I hope that  
5 adds some clarification, but we're interested in  
6 comment on that, as well.

7 543.21, MICS for surveillance. It  
8 requires cameras with sufficient clarity in the  
9 count room, card tables, and cage and vault, and for  
10 Class II gaming systems, the surveillance must  
11 include the jackpot meter. We've revised this from  
12 the discussion draft to remove the requirement of  
13 surveillance of the bingo server, based on public  
14 comment. Physical and logical controls that are in  
15 the IT section appear to be adequate.

16 The commission invites comment on whether  
17 the one-year retention period for surveillance  
18 footage is appropriate. We received one comment  
19 that said that's just way too long, and I wanted to  
20 clarify this, as well. We received a comment in  
21 Green Bay saying, "Does all surveillance footage now  
22 need to be retained for one year," and no.

23 In the proposed rule, if it stays one  
24 year, the proposed rule says that the suspicious  
25 activity, suspected crimes, and detention by

1 security personnel, those are events that need to be  
2 retained for one year, and we're interested in  
3 hearing whether that one year for those events is  
4 appropriate or whether it's too long and what -- if  
5 it's too long, what would an adequate period be.  
6 This section also requires TGRA-approved procedures  
7 for reporting suspected crimes and suspicious  
8 activity.

9 543.23, the MICS for audit and accounting.  
10 The annual requirements here adopt the TAC  
11 recommendation, and 543.24, the MICS for revenue  
12 audit, it's operated from audit and accounting, and  
13 it specifies the frequency of each testing  
14 procedure, and the game sections, those being the  
15 Class II gaming systems, bingo -- I guess it's all  
16 bingo now -- pull-tabs, and card games, those adopt  
17 the TGWG guidance.

18 MR. CHRISTENSEN: I'm Bear Christensen  
19 from Cherokee Nation Entertainment. Would it be  
20 possible to have a better or a more precise  
21 definition for suspicious activity?

22 MS. WARD: That's a good comment. Thank  
23 you for your comment. Do you have any ideas about  
24 what that definition would look like?

25 MR. CHRISTENSEN: Well, I mean, suspicious

1 activity is pretty vague, and I want to make sure  
2 that, you know, what we're -- what you guys are  
3 regulating, you know, is very specific because we do  
4 have to tell our tribal regulatory agents,  
5 specifically fining license, what suspicious  
6 activity or suspicious activity reports are, and so  
7 if we're talking about that, we need to make sure  
8 that the tribal regulatory authorities understand  
9 that that's what they're defining. If not, then  
10 that -- then that should be said, too, to leave it  
11 up for the regulatory authorities in the tribe to  
12 define, as well.

13 MR. HOENIG: I'm sorry. Can you tell me  
14 again what regulation you cited to for the  
15 definition of suspicious activity?

16 MR. CHRISTENSEN: Oh, the Bank Secrecy  
17 Act, Title 41, because there are specific things  
18 that are called suspicious activities. It's a term  
19 of art that we have to follow in terms of suspicious  
20 activities with particular elements that are in  
21 those definitions, so if it doesn't apply to that,  
22 we need to make sure that there's clarity in that  
23 regulation.

24 MS. WARD: Thank you for your comment.

25 That's it. I will open the floor to any

1 questions.

2 MR. LITTLE: Okay. There's a lot of  
3 information that Jen went over, and we've had some  
4 good discussion so far. Is there any other topics  
5 you want to raise?

6 You know, the commission fully understands  
7 that these were just published on June 1st, so I  
8 know many of you may not have been able to look  
9 through these thoroughly. The comment period is  
10 open until July 31st. You do have plenty of time to  
11 gather your thoughts and put things together, and we  
12 are hoping that we will get similar really good  
13 comments as we did during the discussion draft,  
14 so -- we've got a question over here.

15 MS. HOMER: Thank you. Elizabeth Homer,  
16 and I just wanted to briefly raise a comment, going  
17 back to Part 547, which is -- you know, one of the  
18 things that happened when the regulations were first  
19 being developed is there was a Tribal Gaming Working  
20 Group, and there was a long series of meetings  
21 talking about all the various types of Class II  
22 gaming systems, and I'm thinking that this  
23 commission did not have the benefit of participating  
24 in those discussions and reviewing that kind of  
25 technology, and one of the things that it strikes me



1 might be useful before going to final with these  
2 regulations is for the NIGC to sponsor a forum that  
3 allows for vendor participation.

4           You know, right now, these meetings are  
5 not public and there's really not an opportunity to  
6 engage with the vendors other than the  
7 tribally-owned vendor, Rocket Gaming, and I think  
8 that that would really help your thinking on this  
9 grandfather provision and that we should not lose  
10 the opportunity to capture this discussion for your  
11 benefit and your edification before the regulations  
12 go final, and right now, there just has not been an  
13 opportunity for vendors to participate because  
14 there's been no public comment, so there's been no  
15 opportunity for them, and I think it will be very  
16 beneficial to your thinking.

17           You know, one of the things that happens,  
18 and it's easy to do, is, you know, to kind of forget  
19 about the distinction between the Class II gaming  
20 systems and Class III gaming technology, and they  
21 really are different things. You will notice, if  
22 you have an opportunity to review the various gaming  
23 systems, that they really are quite different.

24           You know, one of the discussions that I  
25 had earlier this morning with one of the members of

1 the commission is that -- you know, the question  
2 about whether the box locks or not. In some cases,  
3 there's nothing in the box. Everything is linked to  
4 the server, so having this kind of standard for the  
5 boxes might not make a whole lot of sense if it's  
6 just a cabinet, one in which there's a video monitor  
7 on top of it, so, you know, that's another reason  
8 why that language about the standards that are  
9 applicable shall apply because some of these boxes,  
10 they don't do the same kinds of things that you  
11 would have in a Class III self-contained gaming  
12 device, so I just wanted to kick that back. I think  
13 that that discussion is missing, and I think it's an  
14 important one before you make these final decisions.

15 MR. LITTLE: You're always helpful, Liz.  
16 Thank you for your thoughts. Jess?

17 MR. GREEN: Jess Green, Miami tribal  
18 employee, representative of other tribal  
19 governments. One of the things I think that you may  
20 be missing when you're trying to evaluate is how  
21 many games are we affecting, how many games or how  
22 many gaming systems in all.

23 You've had several gaming commissioners  
24 point out that you don't have any idea how many of  
25 our games you're about to affect if you don't do

1 this grandfathering. The previous commission had  
2 invited the manufacturers, many times over my  
3 objection, to the table and knew precisely how many  
4 games would be affected overall. They didn't have  
5 to ask each tribe to get the numbers. They had  
6 overall numbers from the manufacturers of how many  
7 grandfathered systems were still out in the field.

8 I think if you were to inquire of the  
9 system manufacturers of Class II games, the AGSs,  
10 the Multimedias, the VGTs, those three, plus the  
11 Miami Tribal Development Authority -- that's four.  
12 You get those big four -- if I haven't said  
13 Multimedia, Liz is saying I need to say it again.

14 But you get the big four in. I believe  
15 those numbers will be rather overwhelming for you  
16 because the number of grandfathered systems still  
17 out there is incredible, and that's all I can say to  
18 you, but the manufacturers are in a position to give  
19 you their total numbers, whereas if you get them  
20 from tribes individually, you're going to have  
21 people wondering, "Well, do I protect myself and not  
22 give them anything at all, or do I stand up and say,  
23 'Yeah, I've got this many boxes that are like this  
24 so it comes through the next audit?'"

25 Asking the manufacturer directly, as a

1 part of the process, I think, will get you really  
2 good answers. Thank you.

3 MS. HOMER: And I think just one other  
4 comment, if you'll indulge me -- I'm sorry about  
5 that -- but I did want to touch on, you know, take a  
6 hard look again at the language of the regulation  
7 because I can't imagine that the NIGC really intends  
8 that these grandfathered systems, if they otherwise  
9 meet all the standards, have to be taken off the  
10 gaming floor, but that appears to be the effect of  
11 the way the regulation is drafted, and, to me, that  
12 can't possibly be your intent. I can't imagine that  
13 these gaming systems, if they otherwise meet the  
14 standards, have to be removed from the gaming floor,  
15 and I think that that language, at least, appears to  
16 have that effect.

17 MR. LITTLE: All right. Thank you, Liz.  
18 We will definitely review that.

19 Is there any other question on Part 543 or  
20 Part 547? I know we're coming up on a break here,  
21 but if there's no other questions, I think we can  
22 probably conclude the consultation stage.

23 MR. STEVENS: Granthum Stevens, Pawnee  
24 Nation gaming commission. Basically, as a smaller  
25 tribe, what we are looking at is about 300 machines.

1 I know when the NIGC first introduced this some  
2 years ago, we had Class II on our floor, and what  
3 operations contemplated was shutting down 20  
4 machines out of 70 machines. That was almost a good  
5 quarter of our floor going out the door, so what  
6 operations elected to do was basically eliminate  
7 Class II altogether in the facility and went all  
8 Class III, and that was one of the things that the  
9 tribe had to look at in their decision-making, and  
10 now we come back to it again where we're back in the  
11 same position of where are we at in trying to define  
12 why this regulation, the intent of the regulation,  
13 and where we're going to go with the regulation.

14 Grandfathering, as you see, five years,  
15 we're still in the same boat. We're asking the same  
16 question two years from that point to now, and I  
17 don't think we're ever going to get out of it, and  
18 so the requirements in 543, when we look at it, may  
19 put our operation, as a smaller operation, into some  
20 noncompliance issues. I think that a lot of the  
21 gaming promotions as far as, you know, player  
22 tracking, a lot of that's covered in the BSA, as  
23 well. Title 31 requires your player rating system  
24 on your player tracking.

25 I think you're sort of mimicking that with

1 your gaming promotions in following that criteria,  
2 but mainly, some of these aspects is -- no offense,  
3 but is written for a bigger casino, and right now  
4 with the Pawnee Nation, we had one facility that had  
5 to go Tier B, barely made it into Tier B, and under  
6 the new proposals, we may have to slide back down to  
7 a Tier A, but we're in that limbo right now.

8 I had a question earlier about where we're  
9 tackling 543, and I had raised the question before  
10 it was in 543, and in the compact, it says we're  
11 under 542, so I was wondering how that would come  
12 into play later on in anything else, so that was  
13 basically what I have at the moment, but yes, we are  
14 currently reviewing and will be submitting a written  
15 comment, as well. Thank you.

16 MR. HOENIG: Just to address what you were  
17 saying about 542 versus 543, this 543 is just Class  
18 II games, so any reference in the compact to 542,  
19 those are Class III games, which currently we're not  
20 enforcing or requiring because of the Colorado River  
21 Indian cases.

22 MR. LITTLE: Thank you for your comment.

23 MR. HUMMINGBIRD: Jamie Hummingbird,  
24 Cherokee Nation. I just wanted to dovetail about  
25 something that Liz brought out about reaching out

1 and getting data from the various vendors out there  
2 for the Oklahoma tribes. There are a number of  
3 jurisdictions out there across the USA that rely on  
4 Class II gaming machines just as much as we do, so  
5 our brothers and sisters in Alabama and California,  
6 South Dakota, wherever they may be, are going to be  
7 impacted by this, as well, so it would be a good  
8 idea to get, I guess, a whole listing set of numbers  
9 versus just what we're going to have here in  
10 Oklahoma, which, while it in itself is going to be  
11 significant, it's just going to be a part of the  
12 picture, and I'm not sure how many consultations the  
13 NIGC is going to have between now and the end of the  
14 commentary, but if you're not -- if these same  
15 questions are asked of all tribes, I'm not sure, but  
16 they may not be able to get their data in to you,  
17 whereas if we reach out to the Class II  
18 manufacturers, they could probably have those  
19 figures at their fingertips, so I agree with that.

20 MR. LITTLE: Thank you, Jamie. There's  
21 three additional consultations scheduled, Arizona at  
22 the end of the month, and then we have California  
23 and Washington state in July, so that's a good  
24 point. Thanks for reminding me. A lot of these  
25 questions are in the preamble, so we really urge

1 folks to read the preamble. That provides an area  
2 where we ask questions and also provides some  
3 information on the logic and thinking behind the  
4 decisions that we made, so thanks for reminding us.

5 Are there any other comments? Last  
6 chance. Well, actually, it's not your last chance  
7 because you can submit written comments, so if  
8 there's no other comments, then I think we're going  
9 to conclude for the day.

10 I'll remind everybody once again that the  
11 comment period is open until July 31st. You raise  
12 the bar very high with the very thoughtful comments  
13 that you've had during the discussion comment  
14 period, so we'll be expecting similar good ones.

15 Unless we've answered all the questions,  
16 we've taken care of all the issues raised, so I know  
17 a couple of commenters did raise the issue that  
18 there were some areas that we did not address.  
19 We'll look into those.

20 But other than that, I just want to thank  
21 everybody for coming today. I want to thank all the  
22 staff here in the room and those back in Washington  
23 and other regions that help us throughout this  
24 entire process. Without them, we could never do our  
25 job, and I always say that one of the greatest



1 assets that this commission inherited from previous  
2 commissions is a great staff. I'm very proud of  
3 them and very grateful for all the hard work they  
4 do.

5 I also want to thank the members of the  
6 tribal advisory committee that, you know, did a lot  
7 of hard work and helped us get to where we are. We  
8 may not be exactly where they want to be, but we're  
9 hopefully learning and moving in a positive  
10 direction for this industry.

11 I know I speak on behalf of the chair and  
12 vice-chair that we definitely understand the  
13 importance of a strong Class II initiative. We  
14 understand that compacts are coming up for renewal.  
15 We understand a lot of challenges that you-all face.  
16 We want to work with you. We want to make sure that  
17 the things that we do, you know, help this industry  
18 maintain strong regulation. We need to do that  
19 together. We need to do it through good  
20 consultation, so that's what these consultations  
21 provide us.

22 We definitely appreciate the comments that  
23 we've heard today. We've taken notes on everything  
24 that you've said. I'll bring those back to the  
25 chair and vice-chair, and we'll review those, just

1 as we review every comment that is submitted to us.  
2 We do review them.

3 Sometimes I don't see Jenn and Mike for  
4 days, and I'm wondering where they are just because  
5 they're in their office closely reviewing all the  
6 comments, so I do appreciate it and thank you all  
7 for the comments submitted. I want to wish you all  
8 safe travels, and have a safe trip home. Thank you.

9 (Proceedings concluded at 2:38 p.m.)

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C E R T I F I C A T E

I, Jean Baysinger, Certified Shorthand Reporter do hereby certify that on June 11, 2012, the above and foregoing proceedings were by me taken in shorthand and that the foregoing pages constitute a full, true, and correct transcript of the proceedings held on the date as indicated; and that I am not an attorney for nor relative of any of said parties or otherwise interested in the event of said action.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 18th day of June, 2012.

\_\_\_\_\_

Jean Baysinger, CSR RPR RMR

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