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Via Electronic Mail

National Indian Gaming Commission
1849 C St. NW
Mailstop #1621
Washington, DC 20240

**Re: Comments on Proposed Changes to the Minimum Control Standards,
25 CFR Part 543**

Dear Commissioners:

On behalf of the Lytton Rancheria of California (Tribe), we submit these comments regarding the National Indian Gaming Commission's (NIGC) proposed changes to 25 CFR Part 543, Minimum Internal Control Standards (MICS). The Tribe has no objection to the majority of the NIGC's proposed amendments. However, the Tribe is concerned about the proposed revisions to Section 543.10(e), as discussed below:

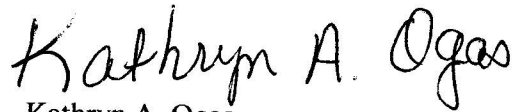
Section 543.10(e) - Standards for Reconciliations of Card Room Bank - The NIGC proposes to amend paragraph (e) to require a supervisory agent independently count both the main card room bank and table inventory at the end of each shift.

Although the current Section 543.10(e) contains a reference to table inventory, the Tribe has interpreted this as a reference to the count of the main card room bank. The Tribe agrees that the main card room bank should be independently counted by a supervisory agent at the end of each shift; however, requiring the table inventory count also be conducted in this manner is overly burdensome and unnecessary.

Counting each table inventory is a time consuming process. If a supervisor is required to conduct this count at the end of every each shift, it will take the supervisor away from his/her normal duties and oversight functions for an extended period of time. The Tribe believes this presents an undue burden on the operations of its Casino, particularly when there are equally effectual methods to mitigate risk. Thus, the Tribe urges the NIGC to change the requirement to allow for the table inventory count to be conducted by an individual from a separate department. Such a requirement will achieve the same goal without placing an undue burden on gaming establishment operations.

The Tribe appreciates the opportunity to submit these comments on the proposed amendments to the MICS and urges you to consider the Tribe's concerns.

Sincerely,

A handwritten signature in black ink that reads "Kathryn A. Ogas". The signature is written in a cursive style with a large, looped "K" and "O".

Kathryn A. Ogas
Attorney for the Lytton Rancheria
of California