



Ottawa Tribe of Oklahoma

P.O. Box 110 Miami, OK 74355

National Indian Gaming Commission
1441 L St NW, Suite 9100
Washington, DC 20005

August 15, 2013

82213-10

Re: Comments on Classification of "Electronic One Touch Bingo System," 78 Fed. Reg. 37998

The Ottawa Tribe of Oklahoma ("Tribe") supports the National Indian Gaming Commission's proposed classification of "server based electronic bingo system games that can be played utilizing only one touch of a button ('one touch bingo')" as Class II games under the Indian Gaming Regulatory Act ("IGRA"). We believe that this proposed classification is fully consistent with IGRA as well as with applicable regulation and case law.

The Tribe agrees with the Commission that a one touch system or other automatic daubing feature does not somehow prevent a game from qualifying as Class II bingo when the game satisfies the statutory requirements of bingo as set forth in IGRA. In the Act, Congress provided the necessary test to distinguish electronically-aided Class II games from Class III games, and that test was not based on the number of touches required to interact with the game.

Based on our review of the proposed classification, the Ottawa Tribe of Oklahoma is pleased to support the National Indian Gaming Commission's proposal as a valid and useful clarification on the subject of electronic one touch bingo systems.

Ethel E. Cook
Chief

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