

1 NATIONAL INDIAN GAMING COMMISSION

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4 PORTLAND REGION

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7 REGULATORY REVIEW CONSULTATION

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12 LITTLE CREEK RESORT

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July 19, 2012

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Shelton, Washington

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1 BE IT REMEMBERED that on Thursday, July 19,
2 2012, at Little Creek Resort, 91 West State Route 108,
3 Shelton, Washington, at 9:07 a.m., before BARBARA L.
4 BRACE, CCR, RPR, Certified Court Reporter, the following
5 proceedings were had, to wit:

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9 CHAIRWOMAN STEVENS: Good morning,
10 everyone. I'm glad to see everybody here today. We have
11 an agenda here. Everybody should have a packet. We're
12 going to follow along with the agenda today.

13 Before we get started, what I'd like to do is turn
14 this over, as is tradition out here, to the host tribe,
15 the Squaxin Island tribal community. Pete Kruger, over
16 here, is the secretary on council, and I will turn it
17 over to Pete for an opening.

18 MR. KRUGER: Thank you. My name is
19 Pete Kruger. I'm tribal council secretary here. It is
20 our honor to welcome everyone here in the NIGC. I hope
21 you have a good time, use your money in our casino, golf
22 course. We need the money.

23 It's a great pleasure to honor everybody here. I'm
24 proud and honored to be able to do this. If you haven't
25 golfed -- I'm not a golfer, but the golf course is

1 beautiful. Go up and do your thing.

2 Thank you.

3 CHAIRWOMAN STEVENS: Thank you,
4 Mr. Kruger.

5 So with that, what we'd like to do next, following
6 along with the agenda, is to have everybody introduce
7 themselves. Also, if we have any tribal leaders here,
8 you're welcome to come sit at the table with us.
9 However, we understand if you're shy and you'd like to
10 stay there.

11 We'll start from here and we'll move the microphone
12 around. If you could please state your name, who you're
13 with, which tribe you're with.

14 MR. GIFFEN: Jack Giffen, Jr.,
15 Confederated Tribes of Grand Ronde Community of Oregon,
16 tribal council secretary.

17 MS. AUBERTIN KELLER: Deneen Aubertin
18 Keller, attorney for Grand Ronde Tribe.

19 MR. HARJU: Philip Harju. I'm the
20 vice chair of the Cowlitz Indian Tribe.

21 MR. LISTER: Nick Lister, Nisqually
22 TGA, information systems specialist.

23 MR. BOYCE: Mike Boyce, executive
24 director of Grand Ronde.

25 MR. DURHAM: David Durham, with

1 Tulalip Tribes of Washington. I'm a tribal gaming
2 inspector.

3 MR. WOOLSEY: Tim Woolsey. I'm the
4 reservation attorney for the Colville Tribes.

5 MR. SHANNON: Lee Shannon. I'm the
6 attorney representing Metlakatla Indian Community.

7 MR. TONASKET: Mel Tonasket, gaming
8 commissioner with the Colville Confederated Tribes.

9 MS. BOX: Good morning. I'm Bertha
10 Box, from the Southern Ute Tribe, Ignacio, Colorado. I'm
11 the chairperson of the gaming commission.

12 MS. TAYLOR: Andrea Taylor, Southern
13 Ute Indian Tribe, vice chair, gaming commission.

14 MS. BRUNER: LaWana Bruner,
15 Stillaguamish Tribe, TGA director.

16 MS. CAPOENAN-BALLER: Good morning.
17 Pearl Capoenan-Baller, gaming commissioner for Quinault.

18 MR. WETZLER: Good morning. Sam
19 Wetzler, executive director for the Puyallup Tribal
20 Gaming Regulatory Offices.

21 MR. ARMSTRONG: James Armstrong,
22 Suquamish Tribe. I'm the executive director for the
23 Suquamish Tribal Gaming Commission.

24 MR. CONTRANO: Roger Contrano,
25 Suquamish Gaming Commission.

1 MR. WHITENER: B.J. Whitener, director
2 of the Colville Tribal Gaming Commission.

3 MR. POLK: Good morning. My name is
4 Dixon Polk, Sr., from the Yakima Nation. I'm one of the
5 gaming commissioners there. My Indian name is Wup Stock
6 Tum.

7 MS. DEYETTE: Diane Deyette, with
8 Squaxin Island Gaming Commission.

9 MS. REPIN: Jennifer Repin, with the
10 Snoqualmie Gaming Commission, commissioner.

11 MR. HANKIN: Mike Hankin, compliance
12 officer of Red Wind Casino, Nisqually Tribe.

13 MR. GOFORTH: Bill Goforth, interim
14 director, Nisqually.

15 MR. McDANIEL: Jesse McDaniel,
16 Muckleshoot Indian Commission, executive director.

17 MS. ADOLPH: Good morning. I'm Patty
18 Adolph, compliance officer with the Colville Tribal
19 Gaming Commission.

20 MR. BILLINGSLEY: Ken Billingsley,
21 general manager of the Indian Head Casino for the
22 Confederated Tribes of Warm Springs.

23 MS. GOUDY SMITH: Dora Goudy Smith,
24 gaming commissioner, Yakima Nation.

25 MR. GRIFFITH: Rick Griffith, internal

1 auditor with Squaxin Island Gaming Commission.

2 MR. STEVENSON: Craig Stevenson,
3 internal auditor, Squaxin Island Gaming Commission.

4 MR. WYNECOOP: Francis Wynecoop,
5 director of gaming for the Spokane Tribe.

6 CHAIRWOMAN STEVENS: Thank you. And I
7 appreciate again everybody being here. I'd like to have
8 our staff, starting this way, introduce themselves and
9 tell everybody who you are and what you do, and then we
10 will introduce the commissioners.

11 MR. WEST: Good morning. My name is
12 Rest West. I'm one of the senior auditors with the
13 National Indian Gaming Commission.

14 MR. PUROHIT: Good morning. I'm
15 Nimish Purohit. I'm the acting director of training and
16 technical assistance, as well as the gaming technology
17 liaison for the commission.

18 MR. HOENIG: Good morning. I'm
19 Michael Hoenig. I'm a senior attorney with the Office of
20 General Counsel.

21 MS. WARD: Good morning. I'm Jennifer
22 Ward. I'm an attorney with the Office of General
23 Counsel.

24 MS. MURRAY: Good morning. My name is
25 Sarah Murray. I'm a member of the Cheyenne River Sioux

1 Tribe of South Dakota, and I am counselor to the
2 chairwoman.

3 MR. MYERS: Shiyo. Osda sunalei. My
4 name is Paxton Myers, member of the Eastern Band of
5 Cherokee Indians. I'm chief of staff of the National
6 Indian Gaming Commission.

7 CHAIRWOMAN STEVENS: Okay. With that,
8 I'd like to turn the mike over to our vice chairwoman,
9 Steffani Cochran, and our associate commissioner, Dan
10 Little.

11 MS. COCHRAN: Good morning. As the
12 chairwoman said, my name is Steffani Cochran. I'm the
13 vice chairwoman, and I'm a member of the Chickasaw
14 Nation.

15 I'm very pleased to be here this morning. And thank
16 you to Squaxin for such a beautiful facility and the
17 comfortable room last night. I look forward to our
18 meeting today.

19 MR. LITTLE: Good morning, everyone.
20 My name is Dan Little. I'm the associate commissioner
21 here with the NIGC. I've been on the commission since
22 April of 2010, and I've been working primarily on the
23 review of the Part 547 and Part 543 for the last year and
24 a half.

25 I'm very excited to be here this morning, and I look

1 forward to hearing all your wonderful comments. Thank
2 you.

3 CHAIRWOMAN STEVENS: Thank you. One
4 last thing. I do want to recognize our regional
5 director, Mark Phillips, right over here. He's going to
6 be running the microphone. I'm sure you've all worked
7 with him out of the region. And also Steve Steiner,
8 who's the compliance officer who's been at the table back
9 there.

10 To my right, your left, is Barbara. She's our
11 transcriptionist. I just want to remind everybody that
12 these are transcribed, and we'll talk about that in a
13 moment.

14 My name is Tracie Stevens. I'm a member of the
15 Tulalip Tribes of Washington, and I am the chairwoman of
16 the National Indian Gaming Commission.

17 I appreciate everybody again attending today. This
18 is the fifth consultation on these particular rules that
19 are proposed in the Federal Register at this time. We'll
20 go into this a bit more as the morning progress.

21 I do want to talk about the meeting agenda. We do
22 try to break up the agenda so everyone has an
23 understanding or has -- can anticipate what we will be
24 talking about and in what order. So it's not an open
25 dialogue on any subject, but that specifically we'll be

1 talking about certain subjects at certain times in case
2 your schedule, you know, requires that you are unable to
3 stay and you need to speak to a particular part.

4 But as it's noted on the bottom of the agenda, the
5 time frames may slow down or speed up, depending on how
6 the conversation goes this morning. So we'll be going
7 through in this order in terms of topics, although the
8 times, you know, allotted are estimates. It may go
9 slower or quicker.

10 Also, we -- just to make clear, that we're not
11 completely wedded to this. If again your schedule does
12 not permit that you're staying long enough for a
13 particular subject to come up, we do open the floor for
14 tribal comments pertaining to any of these parts that
15 we're discussing today.

16 We know that you all have a very busy schedule. If
17 you're a tribal leader, you have a number of other issues
18 besides gaming. If you're a tribal operator or
19 regulator, you actually have a full-time job somewhere
20 else that you are away from, so your schedule may not
21 permit that you stay for a particular topic.

22 We do open up the floor in every spot for comments
23 as we go. We sometimes have people read statements onto
24 the record about the whole parts that -- all the parts
25 that we're talking about, so we certainly welcome that.

1 So with that, I do want to open it up for any
2 statements that need to be read into the record for those
3 who may have scheduling issues.

4 Okay. That will come up again, so if for any reason
5 your schedule requires that you have to depart, let us
6 know, and we'll certainly open up the floor for
7 statements.

8 We'll go ahead and get started. I should have
9 chosen my seat better so I can see where we're at. You
10 should have a packet of PowerPoint that we will go over
11 this morning. And I'll go ahead and start, and we will
12 go ahead and -- after I'm done with my parts here, we'll
13 turn it over to the staff to go into detail about the
14 proposed parts.

15 Before we begin, though, I do want to remind
16 everybody that this is -- we are in the official
17 rulemaking process for Part 543 and Part 547 with notice
18 of the proposed rules that have been published, and that
19 is the topic of today's discussion.

20 It is an official public meeting or consultation
21 specifically just for tribes. If there are
22 tribal-specific issues that do not pertain to these
23 particular proposed rules, we will be happy to talk to
24 you at the break or aside from this -- today's meeting or
25 afterwards.

1 We know that most everybody has come here to talk
2 about these subjects, so we want to make way for the
3 consultation and the rulemaking process to continue
4 today. And if you have any particular concerns or issues
5 or requests of the agency, we can gladly talk to you
6 about that on a side discussion.

7 Okay. So consultation, it's between tribal
8 governments and the federal government. Only tribes and
9 their designees are allowed to attend and participate.
10 These particular consultations are not open to the
11 public, and they are certainly not open to the press.

12 More on consultation. In keeping with Executive
13 Order 13175, this commission is dedicated to discussing
14 policy changes before the changes are made and to talk
15 about the need for change.

16 In the past year and a half, from the time we
17 started with the Notice of Inquiry, we did just that,
18 asking tribes which regs we needed to look at, what were
19 the priority regulations that tribes wanted to review and
20 possibly change.

21 And then, as we've gone along, we were getting
22 feedback on particular regulations that informed
23 discussion drafts outside of the rulemaking process in an
24 informal process, which has now transformed into what is
25 now the proposed rule that you see in the Federal

1 Register and the topic of today's discussion.

2 So that is all of our efforts in meeting this
3 requirement of the executive order to talk about the
4 need, if any, of policy changes before we actually start
5 making those changes.

6 And as has been our practice, the commission is
7 committed to a clear and transparent process. As I said,
8 these consultations are transcribed. They're posted on
9 the website. All comments are posted on the website so
10 that they can be read by all tribes. We have an open
11 forum here so that tribes can hear what other tribes'
12 questions are, what their issues are, and what possible
13 solutions together are.

14 We will review and consider every comment that we
15 receive, and we do in fact do that. We all three have
16 read every comment that has come in. And as one of the
17 staff said yesterday, they've sat through meetings, hours
18 and hours and hours of meetings with us, as we've talked
19 about those and drafting regulations based on input from
20 tribes. So we do consider them and do take them
21 seriously, and any proposed or final rule will include
22 the summary of those comments.

23 If there's -- you know, if there's anything,
24 Steffani or Dan, that you want to add to this, I was just
25 going to turn it over to Dan and to the staff.

1 MR. LITTLE: Thank you, Chairwoman.

2 I'm just going to go over basically the consultation
3 agenda that we're going to talk about today. This is
4 Group 3 of the Notice of Inquiry that was published in
5 April of 2011. Basically that's Part 547, the minimum
6 technical standards for equipment used in the play of
7 Class II games, and then Part 543, the Minimum Internal
8 Control Standards for Class II gaming.

9 How we got there to -- how we got to where we are
10 today was, as I said, a long -- a long process. It
11 started with the Notice of Inquiry, and what we learned
12 from those consultations was that we needed to actually
13 reach out to the tribes and we needed to, you know,
14 develop a process for learning, you know, how the
15 regulations are affecting, you know, each and every one
16 of your facilities, so we formed a tribal advisory
17 committee.

18 And I want to make a special note to mention three
19 individuals from this part of the country that
20 participated in the Tribal Advisory Committee, or what we
21 call the TAC. That was Jeff Wheatley, from the
22 Suquamish; Michelle Stacona, from Warm Springs; and Leo
23 Culloo, from Port Gamble.

24 The TAC consisted of 15 members which of those --
25 those three were on there. When we developed the TAC, we

1 tried to get a good cross-selection of the industry. We
2 got operators, regulators, auditors, and other industry
3 experts because we wanted to learn how each of these
4 different groups that all work together in the facilities
5 have unique responsibility and roles.

6 So we form the Tribal Advisory Committee, first met
7 in fall of 2011, and held four meetings. They were very
8 successful, although they were quite contentious at
9 times.

10 I would be lying to you if I told you it was easy.
11 It was a difficult process, but it was actually a very
12 valuable process, so much in the fact that the commission
13 and, you know, very importantly, our staff learned a lot
14 of the many challenges that you all face in dealing with
15 these regulations.

16 We understand that a lot of you are still relying on
17 the Part 542 regulation for your Class II gaming, and,
18 you know, that was created, you know, a decade ago and
19 technology has changed. There was a real need to
20 implement a new regulation and update the current
21 regulation that's on hold right now that the previous
22 commission had adopted.

23 So we established the TAC, had four very intense
24 meetings, but at the end of the four meetings, the TAC
25 provided the commission with some recommendations which

1 we utilized to put together draft -- discussion drafts
2 for the Part 547 and 543.

3 Both of those were put out in website in the middle
4 of March, March 16, with a 30-day comment period. We
5 received over a hundred comments, and some of those
6 actually requested an extension, so we did extend it to
7 the end of May. We received over a hundred comments.

8 And many of you may know, but prior to coming on the
9 commission, I worked for the Mashantucket Pequot and
10 Foxwoods in Washington and was very involved with a lot
11 of the advocacy -- Indian gaming advocacy issues coming
12 up before the tribe and the industry. And we would
13 participate, you know, as much as you all do.

14 NIGA would send out -- the National Indian Gaming
15 Association, you know, would send out their blast faxes,
16 and we'd participate, and we'd take their form letters
17 and mail it in with our names.

18 We expected -- I expected this during this process,
19 you know, and I was actually wrong. We got -- like I
20 said, we got over a hundred of comments. But they
21 weren't form letters. These were like very unique, well
22 thought out. A lot of time, a lot of effort, and a lot
23 of good information was provided in those -- in those
24 comments.

25 And I'll tell you just, you know -- and I know I

1 speak for the other commissioners. We really greatly
2 appreciate that. I mean, form letters are great, and
3 it's great to hear tribes are, you know, behind an issue.
4 But when we hear the specific, unique, individual
5 challenges and problems that you all are facing and how
6 we can improve the regulations, it's very, very helpful.

7 So like I said, we got a hundred comments. End of
8 May we began working on a Notice of Proposed Rule which
9 we ended up -- April. I'm sorry. End of April. Okay.
10 It was end of April.

11 So we did end up working on the Notice of Proposed
12 Rule that we did publish on June 1, and that's what we
13 have -- we're looking at right now. Now, the -- most of
14 the differences that you'll find from the discussion
15 draft to the Notice of Proposed Rule actually came from
16 the comments that you all provided to us.

17 So we -- the changes that you'll see from those two
18 documents are basically based upon what we heard from
19 you, so that's why your comments are so important and
20 they're so helpful.

21 One thing I want to say that -- and if you haven't
22 done so, I would actually urge you to do so. Read the
23 preambles to both the Notice of Proposed Rules. As you
24 go through there, you'll see the comments that we
25 received, and you'll -- it gives you an understanding of

1 our thought process and what we're thinking. We made a
2 number of -- we put a number of questions in there and
3 some areas that we still needed a little more information
4 in.

5 So as you take the information and you go back, and
6 if you decide to put together some comments, read the
7 preamble, and that will help maybe form -- help you
8 formulate some of your responses and your comments to us.

9 We published the Notice of Proposed Rule on
10 June 1st, with a 60-day comment period that was scheduled
11 to conclude on July 31. We have received a number of
12 comments so far, and actually all of them requested some
13 additional time.

14 So without waiting until the July 31 deadline, we
15 actually extended that to August 15. So the deadline for
16 comments is August 15. We're hoping that you'll be able
17 to take that additional time, read the regulations and
18 then -- and send those in. Like the chairwoman said, we
19 will read every single one of your comments and we'll
20 read the transcripts.

21 I have attended all the consultations. The other
22 commissioners, we've kind of divided it up because of
23 other, you know, requirements around the office. But all
24 the commissioners and the staff do read all the
25 transcripts, we do hear everything that you have to say,

1 and are really interested in getting more feedback in how
2 these regulations affect your facilities.

3 So, like I said, 543 and 547, those are the topics
4 we're going to discuss today. The comment periods, we
5 went over. I'm going to actually turn it over to Michael
6 Hoenig now, who's going to walk us through the PowerPoint
7 presentation on Part 547, actually a really good
8 discussion on the specific changes.

9 If you could follow along and then -- like we said,
10 if you have a question that you want to raise, you don't
11 have to wait until the end. You can grab a mike. Mark
12 is over here, and he'll hand the microphone to you. You
13 can make your comment at that particular time if it's
14 something you want to talk about. Or if you want to wait
15 until Mike concludes with the PowerPoint presentation,
16 and then you can, you know, make your comment.

17 Okay. So I'll turn it over to Mike. Thank you.

18 MR. HOENIG: Thank you, Commissioner.

19 So I'm going to be going over Part 547. And Nimish
20 Purohit here is going to help me out on some of the more
21 technical aspects of the explanations. So as we go
22 through, I might be handing the microphone off to him
23 from time to time.

24 But just to get started, this PowerPoint is going to
25 talk about the changes to the existing regulations, so

1 there's going to be some sections where we just skip
2 through it because there may not be any major changes.

3 So just starting most generally, the first five
4 sections of the existing regulation were rearranged for
5 more logical flow. For example, the definitions section
6 was moved up to the front. I think, in the existing
7 regulation, it's three or four sections in. So we just
8 figured it's better to have all the terms right up front
9 so everybody knows what they mean as they go through the
10 rest of it.

11 We put the implementation section at 547.3. 547.4
12 is all the rules of general application, and we'll talk
13 about those again a little further in just a moment. And
14 kind of the meat of the regulation, with all the
15 compliance requirements, are at 547.5. That's where all
16 that begins.

17 And then within each section, some of the
18 information was reorganized, so we may have taken
19 something out of one section and put it into another one
20 if it seemed to make more sense.

21 So in the definitions section, the first definition
22 to talk about is the definition for EPROM, and I'm going
23 to let Nimish talk about this one.

24 MR. PUROHIT: Thanks, Mike.

25 Everyone that's been in gaming for a while, you've

1 probably heard of EPROM. It's erasable programmable
2 read-only media. And the reason why it was designed --
3 and there were some more regulations that were put in
4 here, and technical standards -- is for those legacy
5 products that still do have EPROM.

6 The sections related to the EPROMs gives the Tribal
7 Gaming Regulatory Authority an option to actually have
8 the products tested. And subsequently, when it does come
9 in, any of the regulations that you have, and the
10 technical standards, are there to make sure that the
11 EPROMs are tested and subsequently approvable under the
12 tech standards.

13 MR. HOENIG: Thank you, Nimish.

14 Another definition that was added was the definition
15 of "patron," and that was added after the Tribal Advisory
16 Committee -- based on their recommendations. We also
17 added definitions for "advertised top prize," "audit
18 mode," "enroll," and "unenroll," all terms that are used
19 throughout the regulations.

20 One definition that was inadvertently, I think,
21 dropped from the discussion draft and was put back in
22 here was the definition of the "electrostatic discharge."
23 We also added a definition for "electromagnetic
24 interference."

25 Another one I'm going to let Nimish talk about a

1 little more is, in the discussion draft, we've added a
2 definition for "proprietary Class II system." Based on
3 the comments we got, folks found that -- the comments
4 found that a little confusing and weren't sure exactly
5 what we were trying to do with that, so it's been taken
6 out in the Notice of Proposed Rulemaking.

7 I'm going to let Nimish talk a little bit about what
8 the idea was behind putting it in and again then taking
9 it back out, based on all the comments.

10 MR. PUROHIT: So initially, back when
11 the technical standards were first adopted and published
12 in the Federal Register in 2008, from then on, up until
13 recently, we get several questions for technical
14 assistance and clarification for tech standards that
15 always talk about the fact that, if you have a Class II
16 system that's connected to a common back-of-the-house
17 system, does that back-of-the-house system also need to
18 be tested to these technical standards.

19 And the answer for both back then, and even
20 currently, is that no, it doesn't have to, unless the
21 Tribal Gaming Regulatory Authority requires that.

22 But because these are minimal standards, and the
23 purpose for making sure that that's distinguished in
24 here, is, we had tried adding the word "proprietary" that
25 says, if a particular Class II system by manufacturer A

1 has its own unique tracking system, ticketing system, et
2 cetera, that's self-contained in the Class II system,
3 only that product has to be tested to the requirements of
4 547 and none of the other interoperability with that
5 common back-of-the-house system.

6 So that's what we tried to take in the approach to
7 the discussion draft. And we got several comments and
8 feedbacks saying that, if you use the word "proprietary,"
9 it does have certain other legal connotations associated
10 with it. And that's the reason we decided to remove
11 that, and here we are with that.

12 Even going forward, and the approach that we've
13 taken with the draft right now, is that in the preamble
14 we actually added clarification on why the proprietary
15 term was removed and what is the general applicability of
16 the standards, as far as the back-of-the-house systems
17 are concerned, et cetera.

18 MR. HOENIG: Thank you, Nimish.

19 And to go with that, we had also put the word
20 "proprietary" into some of the other definitions,
21 including cashless systems and voucher systems. And so
22 since we were taking out the definition of proprietary
23 Class II system component, we took the word "proprietary"
24 out of those other definitions as well.

25 The definition for "agent" does not include computer

1 systems. This was a comment that we had received, asking
2 us to include that. Based on the review for technical
3 standards, it was not included.

4 547.3, who is responsible for implementing these
5 standards, this was moved from 547.5. This carries over
6 a lot of the language that's still in the -- that was in
7 the existing regulation. The important thing is, these
8 are minimum standards. The Tribal Gaming Regulatory
9 Authority can enact stricter standards if they want to.

10 This is not intended to be any kind of limitation on
11 technology. Just as the other technical standards, it is
12 not intended to limit the kind of technological advances
13 that are constantly developing in Class II gaming.

14 Only the applicable standards applies. So if there
15 is a standard here, and your particular system just
16 doesn't use this kind of component and there's a standard
17 in there for that kind of component, then it's not
18 applicable, so you don't have to worry about that.

19 And finally, it does nothing to change the state
20 jurisdiction over Class II gaming. Nothing in here
21 affects the limitations or lack of state jurisdiction for
22 Class II gaming.

23 MR. HARJU: Can I ask a question?

24 MR. HOENIG: Sure.

25 MR. HARJU: Again, I'm Phil Harju,

1 from the Cowlitz Tribe.

2 So did you receive any comments from state
3 regulators on that, your point that there will be no
4 state regulation of Class II?

5 MR. HOENIG: We got one comment from a
6 state, and it wasn't the regulator. It was -- if you go
7 on our website, you'll see it was a comment from the
8 Alabama attorney general. But it didn't go to state
9 jurisdiction directly, and we addressed the comment in
10 the preamble. It was more about how these might affect
11 classification. So we addressed his comments, thanked
12 him for his comment, but there's no change in state
13 jurisdiction.

14 MR. HARJU: I guess my follow-up
15 question is then, on behalf of the commission, it would
16 be clear that there is no intent to allow any state
17 regulation of Class II gaming?

18 MR. HOENIG: No. That's what this is
19 intended.

20 MR. HARJU: Thank you.

21 MR. HOENIG: Okay. Great.

22 Let's see. So 547.4, this is, what are the rules of
23 general application for this part. We moved this from
24 547.5, I believe.

25 The biggest change here is the removal of the

1 minimum odds requirement. The existing regulation has
2 fairness standards which requires the odds for the top
3 prize -- winning the top prize to be less than 1 in
4 100 million. That's been removed, and we'll talk about
5 it a little bit further in this presentation.

6 Instead, there's been a new notification
7 requirement. So if the odds are greater than 1 in
8 100 million, someplace on the machine or the display of
9 the system has to notify the patron of that. We'll talk
10 about that just a little further down the presentation
11 here.

12 The test lab must calculate and/or verify the
13 mathematical expectations and report to the TGRA. This
14 is the test lab figuring out the mathematical
15 expectations and then giving a report to the TGRA.

16 In addition to this, if the TGRA wants to do their
17 own test, they can ask the manufacturer to submit the
18 mathematical expectations directly to the TGRA, so they
19 can verify, if the TGRA desires, verify what the test lab
20 is reporting.

21 As with the existing regulation, before any gaming
22 equipment or software can be used or put on the gaming
23 floor, it has to be reviewed and approved by the Tribal
24 Gaming Regulatory Authority. All the equipment must
25 perform according to the design and operating

1 specifications.

2 Section 547.5, like I said earlier, this is kind of
3 where you get into the meat of the regulation. This is
4 all the requirements that -- the standards that are set
5 out. This is the section that we definitely got the most
6 comments on from the discussion draft because this is the
7 section that has the grandfathering provision.

8 The idea of the grandfathering provision is, when
9 the technical standards were first implemented in 2008,
10 the commission wanted to give a certain amount of time
11 for tribes to submit all their existing games for
12 testing. And if they were certified to a lower standard
13 than the new regulations, they could continue to be used
14 for five years.

15 That five years is up next year, I believe October
16 of next year, or November. And at that point, all the
17 machines that were grandfathered, all the Class II gaming
18 systems that were grandfathered, either have to be
19 brought into full compliance of the regulations, the
20 technical standards, or they have to be removed from the
21 floor.

22 The discussion draft had made some changes to that.
23 It changed it in the sense that it made everything more
24 up to date, since the initial certification period had
25 passed and the five years was about to run.

1 Lots of comments asking that the grandfather
2 provision be just taken out, that any game that's on the
3 floor can be continued to be used until it's -- basically
4 until the market drives them out or until they're broken
5 and need to be replaced.

6 So as part of this discussion -- excuse me. As part
7 of the Notice of Proposed Rulemaking, the commission kind
8 of reset everything and put it back to where it is in the
9 existing reg and asked for a lot more information.

10 So as Commissioner Little was saying, go through and
11 look at the preamble so you can see what the questions
12 are and you can see what kind of information the
13 commission is looking to receive so they can decide how
14 they want to proceed with the grandfathering.

15 Basically, the questions are kind of broken out into
16 three categories. First is, how many Class II gaming
17 systems will be affected if the current date of
18 November 10, 2013 -- so that's the date when all the
19 grandfathered systems have to be brought into compliance
20 or removed from the gaming floor -- if that date is
21 extended, so if it's extended by, say, another three
22 years or another five years to give operations more time
23 to get the Class II gaming systems into compliance, what
24 effect will that have or how many Class II gaming systems
25 will be affected. Also, what will be the regulatory

1 impacts for extending the period three years past
2 November 10, 2013, or just removing the time period
3 altogether.

4 In another category, for any Class II gaming system
5 to be grandfathered, it had to be submitted for testing
6 within 120 days of the regulation going into effect. So
7 if anybody, any facility or any manufacturer, had games
8 and they missed that 120 days, they can't be
9 grandfathered. The window is closed.

10 So another question is, how many Class II gaming
11 systems could be potentially submitted to the labs if
12 that 120-day period is modified. So if it's opened up or
13 it's done away with, how many noncertified games are out
14 there that could be used as a grandfathered game, and
15 what would be the regulatory -- what would be the
16 regulatory and other impacts of allowing a limited
17 submission period for those symptoms that did not meet
18 the original deadline, so if we just -- if the commission
19 just set up another 120 days, for example.

20 And then lastly, the idea of bringing games into
21 compliance without a specific deadline, but anytime a
22 game or a system was modified, that modification had to
23 bring the game into compliance or that modification had
24 to be in compliance, so it would be working towards fully
25 compliant systems over a period of time.

1 Along the same lines, but a little different, is,
2 anytime the system or the individual game had to be
3 repaired or modified -- so if something broke and you had
4 to replace a screen or a game panel -- and that had to be
5 brought into full compliance with the technical
6 standards, what would the effect be then.

7 So that's the information that the commission is
8 looking for on the grandfathering provision, to bring --
9 so that they can make the most informed decision.

10 Also in 547.5, the proposed rule amends the test lab
11 certification requirements from the discussion draft
12 based on the public comments. So test labs must note
13 compliance with standards set forth by the TGRA. This
14 gets rid a -- of or does away with the requirement that
15 was in the discussion draft.

16 And I'm not sure about the existing regulations. I
17 kind of get them all mixed up in my head sometimes. But
18 the TGRA had to test the games to any other applicable
19 federal laws or regulations. The comments we received
20 were, that's way too much. We can't ask the test lab to
21 go out and research every single federal law or
22 regulation that may pop up.

23 So instead, the discussion draft requires the test
24 labs to test to these standards and any other
25 requirements that the TGRA may require. So, you know, we

1 figured that the regulatory authorities and the
2 operations are going to know which laws are out there
3 that affect the play of the games, so they'll know what
4 to include for the testing labs. And it's not our job to
5 enforce every single federal law or regulation out there,
6 so that was taken out.

7 And then there's no substantive changes to 547.6, so
8 we're going to skip that and go to 547.7. And that is,
9 what are the minimum technical hardware standards to
10 Class II gaming systems.

11 So the player interface must be labeled with the
12 serial number and date of manufacture. The discussion
13 draft had the word "display," that it had to display the
14 serial number.

15 We got a lot of comments, saying that was confusing
16 because every stand-alone device or every device has its
17 own display, the screen. And people were saying, well,
18 does it have to be on the screen or can it be anywhere on
19 the box, so we changed it just to say that it has to be
20 labeled.

21 The section also removed any references to the
22 Underwriters Laboratory. Instead, now the test lab just
23 has to certify that the game has been certified to
24 withstand spills, those kind of things. But each
25 individual test lab doesn't have to do that, and there's

1 no reference to Underwriters Laboratory now.

2 547.8 is the technical standards for software. This
3 removes any references to entertaining displays. The
4 existing regulation had language in there about the
5 last-game recall, for example, had to show the
6 entertaining display.

7 And because of -- all the comments we received
8 rightly pointed out that the entertaining display has
9 nothing to do with the game of Bingo, it's just that.
10 It's an entertaining display. The Bingo game is on the
11 card. There's nothing in here that requires any longer
12 the last-game recall show the entertaining display. In
13 fact, I think we removed all references to "entertaining
14 display" throughout the regulation.

15 This also allows for changes in the rules, just as
16 the existing regulation does, but that -- those changes
17 in the rules can't be automatic, and they can't be
18 undisclosed. So the patron has to know anytime the rules
19 change.

20 Other than that, that's it for .8. And there's no
21 substantive changes to .9, .10 or .11, so we'll move on
22 to 547.12.

23 547.12 is the technical standards for downloading on
24 a Class II gaming system. This removes the requirement
25 in the TGRA, the Tribal Gaming Regulatory Authority,

1 authorize all the downloads.

2 It hasn't been taken out of the general NIGS
3 regulations altogether, but we put -- we got a lot of
4 comments, correctly pointing out that this is a control
5 standard. This doesn't belong in the technical
6 standards. So Jennifer, when she talks about the MICS,
7 will talk about this a little bit more, but basically
8 this requires the move over to Part 543.

9 This also requires the Class II gaming system be
10 capable of providing download information, and the
11 downloaded software must be capable of being verified by
12 the Class II gaming system. That's the changes to the
13 download requirements.

14 547.14 -- there's no substantive changes to 547.13,
15 so .14 is, what are the technical standards for
16 electronic random number generators. There's a new
17 requirement that we'll let Nimish talk about in here that
18 requires the use of an unbiased algorithm with any bias
19 reported to the TGRA. We'll let Nimish explain that.

20 MR. PUROHIT: I'll make sure I go a
21 little slower, because at the last consultation the
22 transcriber yelled at me for going too fast in this
23 section.

24 So when you look at the 547.14 for the random number
25 generator technical standards, they are quite technical.

1 And if you look at them in their entirety, they are meant
2 for guidelines, just like with the rest of the technical
3 standards, for independent test labs to verify that all
4 of the requirements -- applicable requirements of 547 are
5 met.

6 And there's a section in here as well for random
7 number generators that deals with the bias in the actual
8 algorithm itself. And when you look at it in context,
9 it's talking about the mapping and the scaling
10 requirements and whether or not a bias exists.

11 So currently there is a technical standard
12 specifically that states that any biases of 1 in
13 100 million must be verified and then approved
14 appropriately.

15 Back in 2008, when the technical standards were
16 first introduced, there was a subsequent bulletin that
17 went out, Bulletin 2008-4, that talked about the fact
18 that one in a hundred million is not necessary applicable
19 to Bingo ball draws.

20 So the bias measurement itself was revised to
21 roughly 1 in 57 million, to make sure that it was
22 applicable to Bingo, and that's what was actually
23 presented to the Tribal Advisory Committee when they were
24 reviewing this.

25 And one of the recommendations that was made and

1 that was subsequently adopted and passed on by the Tribal
2 Advisory Committee was that the actual bias itself,
3 instead of putting any numerical quantity in there, there
4 should just be a generic catchall that says, any bias in
5 the scaling algorithm of the random number generator must
6 be reported to the Tribal Gaming Regulatory Authority so
7 that the TGRA can make any decision on whether that bias
8 is too much or too little.

9 We got several comments in the public comment period
10 that said that, you know, that's not necessarily a
11 testable standard. It's too vague. And what we're
12 requesting in return is, please let us know why this is
13 not testable or why the particular requirement is too
14 vague, in any comment that you send in to us. That's
15 kind of the situation with this particular standard
16 itself.

17 MR. HOENIG: Thank you.

18 So in addition to the changes in the algorithm,
19 there are also now some mandatory testing requirements.
20 This was based on discussions with the Tribal Advisory
21 Committee, suggesting that these four tests -- I'm
22 sorry -- three tests be mandatory for all random number
23 generators.

24 That's the Chi-square test, the Runs test, and the
25 Serial Correlation test. There are still other tests

1 that are named in the regulation, and those are found at
2 the discretion of the Tribal Gaming Regulatory Authority.

3 There's no changes to 547.15. So 547.16 is, what
4 are the minimum standards for game artwork, glass, and
5 rules. Earlier I talked about the fact that, in the
6 fairness standards, we removed the minimum odds
7 requirements, so there's no longer a requirement that the
8 odds be less than 1 in 100 million.

9 However, if they do exceed that -- those odds, then
10 there has to be a notification put in -- the patron
11 basically has to be notified that the game they're
12 playing has odds of winning the top prize of greater than
13 1 in 100 million. This is the language in the
14 disclaimer.

15 In the discussion draft, it had language saying that
16 this has to be continuous -- continuously displayed.
17 That language has been taken out. It doesn't have to be
18 always up there, you know, when the game is being played.
19 It can be put on the rules screen or on the odds, how the
20 game is played. There's no longer any continual display.

21 And lastly, 547.17, this is, how do -- how does the
22 TGRA apply to implement an alternate standard to those
23 required by this part. This, in the existing regs, is
24 called the "variance section." We've changed that in
25 both this section and in the Minimum Internal Control

1 Standards because, in the Minimum Internal Control
2 Standards, the term "variance" is used to mean a couple
3 different things, or at least it was.

4 And so to make sure that it was clear what kind of
5 variance we were talking about, we just took this when
6 you're applying -- when you're trying -- when TGRA wants
7 to implement a different standard than that in these
8 regs, it's called an "alternate standard" now.

9 So the regulatory authority must submit the
10 alternate standard within 30 days of its approval. The
11 chair then has 60 days to approve or object. And based
12 on discussions with some of the field staff that go out
13 and look to see if these alternate standards are
14 reasonable, they said, sometimes 60 days is more than
15 enough time. Other times it may be a little more
16 complex, and so 60 days might not be enough. So, if
17 needed, the chair may extend the review period another 60
18 days.

19 The alternate standard can't be implemented unless
20 approved by the TGRA or the NIGC chair. Once the TGRA
21 approves the alternate standard, it can go into effect.
22 Then it gets submitted to the commission -- to the
23 chairwoman for review.

24 And then the appeal of any objections to an
25 alternate standard has been taken out of this section and

1 put into our general appeals section. One of the
2 regulatory changes that the commission has made is to
3 take all the different appeals parts that were in various
4 parts scattered throughout the regulation and consolidate
5 them all into one, so you just have one appeals process
6 for everything. It seems much simpler than trying to
7 figure out who do you appeal to, so it's all been
8 consolidated.

9 I believe that is it for the technical standards.

10 MR. LITTLE: Okay. Thank you, Mike.

11 I'll open the floor up right now to any questions or
12 comments anybody has. Anyone?

13 There's a lot of stuff in here. I know we're sort
14 of in the middle of the comment period, so many of you
15 may have not had a chance to fully review this.

16 In the back of the room we have a taker.

17 MS. GREEN: Good morning. My question
18 actually --

19 MR. LITTLE: Can you state your name
20 and organization?

21 MS. GREEN: Thank you. Nancy Green,
22 Green Law Firm. I represent the Chickasaw Nation in
23 Oklahoma.

24 My question is, at this point have you received
25 enough information in regard to your questions? Have you

1 received responses that give you any indication how you
2 may consider changing the grandfathering provisions?

3 Have you -- well, and I say that because I note that
4 there are changes that you've proposed in different
5 parts, and so I'm just wanting to know if you have any
6 feedback, so to speak, in regard to proposed or possible
7 changes to the grandfathered provisions?

8 MR. LITTLE: Obviously, the feedback
9 we've got -- we've done four previous consultations.
10 We've heard that there were some issues with that, that
11 we were reviewing.

12 As far as written comments, like I said earlier, the
13 only written comments that we've gotten to date are folks
14 requesting an extension of time. So, you know, just like
15 with other regulations and just like with the discussion
16 draft, we're going to wait until the comment period
17 closes and we've had a chance to fully review all the
18 comments, all the transcripts, and everything that has
19 been presented to us before we make a decision.

20 MS. GREEN: In regard to the extension
21 of time, I understand now it is --

22 MR. LITTLE: August 15.

23 MS. GREEN: August 15. And is that a
24 time period sufficient for the rules -- whatever changes
25 to be implemented during this NIGC term?

1 MR. LITTLE: Yes, we believe so.

2 MS. GREEN: That's all I have.

3 MR. LITTLE: Thank you, Nancy.

4 Okay. Is there any other folks that want to make a
5 comment?

6 CHAIRWOMAN STEVENS: I asked this
7 during the panel yesterday, and we have a number of
8 tribes that are represented here. Could I get a show of
9 hands of the number of tribes that have Class II
10 machines?

11 Okay. I'm going to do a count for the record, more
12 hands are popping up. So it's about 16. There may be
13 duplicate tribes here that are represented.

14 I'm wondering -- my first question then is, how many
15 of these are on mixed floors, m-i-x-e-d, so your twos are
16 mixed in with your threes?

17 Okay. There's about -- it looked like about 13. I
18 also want to know which tribes have a stand-alone Bingo
19 or Class II facility? Muckleshoot -- so four. In
20 addition, you may also have stand-alone Class II
21 facilities, but also have a mixed floor, m-i-x-e-d.
22 We'll talk about the MICS in a moment.

23 I'm just trying to gauge sort of what the effect is
24 in this particular region, but I also realize there are
25 some other folks here that are from other regions besides

1 the Northwest.

2 Now, we would certainly ask that -- I know many of
3 the people here who are attending today are regulators
4 and probably just wanting to get information from us
5 today and may not necessarily have comments to submit to
6 the record, and you all probably have to go back to your
7 tribal councils and make sure, you know, what your
8 position is after you've evaluated this regulation and
9 its potential effect on your facilities.

10 But please do provide written comment, as the
11 associate commissioner said. We've received very
12 facility- and tribal-specific comments on the discussion
13 draft, which is incredibly helpful because it did inform
14 our -- the proposed draft that is out today.

15 So please do evaluate that, given the number of
16 hands that I saw come up, and how this particular
17 regulation, Part 547 -- how it reads, how it would affect
18 you.

19 If there's good things, too, because we do like to
20 have some affirmation that we got it right, and part of
21 that is the contribution that tribes have made to the
22 proposed rules.

23 So we want to -- you know, if it does work, please
24 tell us. If there's improvements that need to be made or
25 how this might affect your tribe, please do submit that

1 in writing.

2 MR. LITTLE: Okay. Any other
3 comments?

4 I guess we can move on to the Part 543. I would
5 say, if there's -- like the chairwoman said earlier, if
6 there are any folks that need to make a statement for the
7 record for their tribe, you can do so now.

8 We've got a scheduled break at 10:30. We're
9 thinking maybe we'll get through the PowerPoint before
10 that or -- after we finish the PowerPoint presentation,
11 we'll take the scheduled break and come back and do the
12 Q and A.

13 I'll turn it over to Jennifer Ward to go through the
14 Part 543 presentation.

15 MS. WARD: Good morning. I'm Jennifer
16 Ward.

17 We're talking today about Part 543, the Minimum
18 Internal Control Standards for Class II gaming. This
19 part addresses only Class II games and their associated
20 functions. It's not on the slide, but it's important to
21 note again that the comment period has been extended, and
22 that closes on August 15.

23 This proposed rule, it's based on the discussion
24 draft, which was a new document, and we took ideas and
25 language from many sources, and those included the

1 current MICS, the TAC recommendation, the TGWG guidance,
2 and the 2010 proposed MICS.

3 There are a few changes from the discussion draft
4 that we made generally here throughout this proposed
5 rule. One of those is that we reviewed the use of
6 "agent," "person," and "personnel" throughout, and we
7 made changes to make sure that when we're using the term
8 "agent," we actually mean agent and not some other
9 person, like perhaps emergency personnel that needs to
10 get into the facility.

11 We also inserted "as needed" language in each of the
12 supervision provision, and this excepts the IT section.
13 We've done that to promote consistency in the proposed
14 rule. We've also added supervision provisions for the
15 patron deposit account, lines of credit, and surveillance
16 sections.

17 We've amended a few of the definitions here from the
18 discussion draft. One of those is that the drop proceeds
19 definition has been amended to include financial
20 instrument storage component proceeds.

21 We realized that the original definition in the
22 discussion draft only included drop boxes. We wanted to
23 make sure that we were including Class II games systems
24 as well.

25 The "drop" definition has been deleted as

1 unnecessary because the process of collecting the boxes
2 and the components is described in the drop and count
3 section itself.

4 Unchanged from the discussion draft is the
5 definition of "gaming promotion." And that's altered
6 from the current MICS to include only those promotions
7 that require game play to participate.

8 So, for example -- we'll talk about this more
9 later -- but a tumbler drawing that anyone can slip a
10 card into. That would not be considered a gaming
11 promotion under this part.

12 We've also added the definition of "sufficient
13 clarity." And this is the same as in the discussion
14 draft, but it's been amended from the 2010 proposal.
15 This definition continues the 20 frames-per-second
16 minimum, but also adds, it must be a resolution
17 sufficient to clearly identify the activity being
18 recorded.

19 There was one comment that suggested the 20 frames
20 per second may limit technology. And the commission
21 requests comment on whether the 20 frames per second or
22 equivalent language, if that was added, would that
23 resolve the concern. The commission also invites
24 comments on how the 20 frames per second may limit
25 technology. We weren't clear on that in the first place.

1 Section 543.3, how tribes comply with this part.
2 These are minimum standards, and a Tribal Gaming
3 Regulatory Authority may establish additional controls
4 that do not conflict with this part.

5 The regulations provide a framework that recognize
6 the significant role of TGRAs. Throughout this document,
7 the TGRAs are required to establish thresholds for
8 investigating variances and implement procedures for
9 various standards.

10 There are different compliance deadlines for
11 established facilities and new facilities. Existing
12 facilities have 12 months to come into compliance, and
13 the new facilities must comply upon opening.

14 Then Section 543.4, does this apply to small and
15 charitable operations. There was a question here as to
16 whether the exceptions for small and charitable gaming
17 are redundant to each other.

18 Historically the charitable gaming exception came
19 first and established a \$3 million threshold and sets
20 forth additional criteria for charitable. Later, the
21 small gaming exception came in, and it also has a
22 \$3 million threshold, but doesn't have the additional
23 criteria.

24 We're wondering if we can streamline the regulation
25 by deleting the charitable exception because it's already

1 covered. Those charitable gaming operations are already
2 covered under the \$3 million small gaming threshold.

3 We've received some comments that said it may
4 mislead people into thinking there's no longer a
5 charitable extension and that, if it's not broke, don't
6 fix it, but we requested additional comments on that.

7 Section 543.5, how tribes apply to use an alternate
8 standard. This is just what Michael was talking about
9 earlier. In this MICS part, we discuss variances as
10 anything that differs from the expected result. So if
11 you've got a win percentage that's coming in that's not
12 what you're expecting it to be, that's a variance that
13 may or may not need to be investigated.

14 We changed the language here. This is a new term.
15 It's an alternate standard. So if the tribe has a
16 different standard other than what the MICS require
17 that's still as stringent, they can apply to the
18 commission to have that used instead.

19 And the TGRA may approve the alternate minimum
20 standard. They submit it to the NIGC chair for approval,
21 and the NIGS chair has 60 days. And we've heard from the
22 field that sometimes 60 days is more than enough time and
23 other times it's not nearly enough, so this provision
24 also allows the chair an additional 60 days if that's
25 necessary. In the meantime, before the tribe -- before

1 the NIGS chair approves the alternate standard, the tribe
2 can go ahead and use that standard, so long as it's been
3 approved by the TGRA.

4 Section 543.8, MICS for Bingo. This underwent
5 significant revision from the discussion draft, based on
6 public comments. We heard from many that Bingo is Bingo,
7 and you don't need to distinguish between manual Bingo
8 and gaming machines, and the commission agrees. And as a
9 result, the Class II gaming system Bingo and manual Bingo
10 have been combined into one section here, based on the
11 public comments, and that's 543.8.

12 543.7 has now been reserved. This section is less
13 procedural than the existing MICS, but it requires the
14 TGRA and/or the operation to establish controls that meet
15 detailed criteria. For an example of this, you can take
16 a look at 543.8(b)(1) that discusses Bingo card
17 inventory.

18 This also requires verification of prizes over
19 \$1200. And as another result of public comment, we
20 corrected an earlier oversight that now allows gaming
21 systems to serve as the sole verifier and validator for
22 payouts less than \$1200 and as one of the validators and
23 verifiers for payouts of more than \$1200.

24 Section 543.9, the MICS for pull-tabs. Pull-tabs
25 continue to require a \$600 or more prize verification.

1 And we've also added the ability that the kiosks may
2 be capable of redeeming and reconciling pull-tabs. We
3 received a comment that said it may limit technology if
4 we require machines to deface the pull-tabs. Currently
5 defacing is required by anyone processing pull-tabs,
6 doing the redeeming and reconciling of them.

7 And because machines may not be able to do that,
8 this part has been amended to allow kiosks to do the
9 redeeming and reconciling of the pull-tabs, so long as
10 those pull-tabs are then secured and destroyed in
11 accordance with TGRA policy after being removed from the
12 machine.

13 We are going through this fairly quickly. I just
14 wanted to issue another reminder. If you have a comment
15 or a question as I'm going through, please feel free to
16 interrupt me. We're here for you and your comments and
17 your questions.

18 Section 543.10, the MICS for card games, this
19 section requires the TGRAs to review and approve
20 cancellation and removal procedures. And it continues
21 the standard that no administrative or overhead fees may
22 be taken from player pool funds.

23 We did receive one comment, that the supervision
24 section may not be adequate to provide supervision of the
25 card room, and we requested additional comments on that.

1 That section, as it reads, allows a dealer to function --
2 a supervisor to function as a dealer and have disputes
3 resolved by a supervisor from another department. Those
4 comments suggested that may not be adequate supervision,
5 so we had requested additional comments there.

6 Section 543.12, the MICS for gaming promotions and
7 player tracking. The gaming promotion standards again,
8 as we discussed in the definitions section, gaming
9 promotions are limited under this part to only those
10 promotions that required game play to be eligible to win.

11 So again, a door prize, tumbler raffle, anything
12 that patrons can put a free card into to win, that's not
13 covered here. Anything that requires game play to be
14 eligible for the prize, that's covered under gaming
15 promotions. Similarly, this section covers player
16 tracking systems because it's tracking game play and
17 awarding prizes based on game play.

18 Section 543.13, the MICS for complimentary services
19 and items. The TGRA and the operation are to establish
20 specific controls and procedures for comps, and the TGRA
21 establishes the threshold for recording those comps.

22 Section 543.14, the MICS for patron deposit accounts
23 and cashless systems. We removed any reference to
24 unrestricted player accounts because it conflicts with
25 the Bank Secrecy Act which doesn't allow accounts to be

1 accessed by anyone. It's got to have a specific person
2 associated with the account and know who's accessing
3 that.

4 543.15, the MICS for lines of credit. This covers
5 the establishment of lines of credit. And we have
6 received -- I think it was maybe one comment, there may
7 have been more -- suggesting this provision may be
8 unnecessary, and we invite comments on that.

9 We have heard at several consultations that many
10 tribes still do use lines of credit, and we have heard
11 from other tribes that they're considering beginning to
12 use lines of credit. If there is a reason this is
13 unnecessary, please submit your comments and let us know.

14 Section 543.17 is the MICS for drop and count. This
15 has been simplified and allows for more TGRA and
16 operation discretion. However, you'll note, when you go
17 through this section, that drop and count is still a very
18 procedural section, because that's what drop and count
19 is. It's the nature of the beast.

20 Section 543.18, the MICS for cage, vault, cash, cash
21 equivalents, and kiosks. Here we've added kiosks into
22 this section. It requires further that any cage increase
23 or decrease of \$100 or more must be verified, documented,
24 and recorded, and that promotional payments of \$100 or
25 more must be documented.

1 Section 543.20, the MICS for information technology
2 and IT data. This is where you'll find the download
3 requirements that Michael discussed in 547.12. It also
4 covers Class II gaming systems and physical controls.

5 You see the whole list here about what's in this
6 section. I won't read through all of it, but hitting a
7 few, you have the physical security and logical security.
8 The remote access -- these are all important parts, but
9 remote access is particularly important. Data backups
10 and software downloads, you'll find all of those here in
11 this 543.20.

12 And in this section we've added a definition of
13 "system" in the IT section, based on public comments for
14 the discussion draft. There was comment that our use of
15 "system" may be confusing, and it may be confused
16 particularly with Class II gaming system.

17 And we wanted to specify that here "system" means
18 anything associated with the IT system. I can't remember
19 what those examples were.

20 Rest, what's part of the system we added in the IT
21 definition? Do you remember?

22 MR. WEST: Well, just general server
23 and --

24 MS. WARD: The server system. And
25 there were additional parts that I don't have in front of

1 me. Anyway, the definition is there. The point is that
2 it distinguishes it, and it clarifies that we're not
3 talking about the Class II gaming systems.

4 MR. WEST: It would also be like the
5 other periphery equipment that's not in the Class II
6 gaming systems.

7 Whatever other IT systems that are not directly
8 related to the Class II gaming systems that would also be
9 covered by the IT MICS are included in the IT section.
10 This might be if you have IT data -- a computerized
11 system for your cage inventory, Bingo card inventory, any
12 other systems that the IT MICS would cover.

13 MS. WARD: Thank you, Rest.

14 Section 543.21 is the MICS for surveillance. This
15 requires that cameras with sufficient clarity monitor the
16 count room, the card tables, and the cage and vault. And
17 again, that "sufficient clarify" definition is the 20
18 frames per second and at a resolution to clearly identify
19 the activities.

20 For Class II gaming systems, the surveillance must
21 include the jackpot meter. And here we've also responded
22 to public comments, and we've removed the requirement
23 that surveillance of the Bingo server is required.

24 After reviewing it, we've determined that there is
25 no longer a need to have surveillance in the minimum

1 standards. The TGRA is free to require it, but in the
2 minimum standards, there was no need to require
3 surveillance at the Bingo server because that's covered
4 adequately by the physical and logical controls that are
5 addressed in the IT section.

6 The commission invites comments on whether the
7 one-year retention period for surveillance footage is
8 appropriate. Generally the surveillance retention period
9 is only seven days. In cases where there is footage of
10 suspicious activity, suspected crimes, and detention by
11 security personnel, this proposed rule requires a
12 retention of one year.

13 The commission invites comments on whether that's
14 too much or not enough or just right or there's some
15 other alternative. This also requires the TGRA to
16 approve procedures for reporting suspected crimes and
17 suspicious activity.

18 Section 543.23 is the MICS for auditing and
19 accounting. The annual requirements in this sections got
20 adopted by the Tribal Advisory Committee's
21 recommendation.

22 And 543.24, the MICS for revenue audit. This has
23 been separated out from audit and accounting. It
24 specifies the frequency for each testing procedure, and
25 the game sections have been adopted from the Tribal

1 Gaming Working Group guidance. You'll also see here that
2 the Bingo sections have been combined in the audit
3 section as well to reflect the change that was made to
4 543.7 and 543.8.

5 And we'll open up the floor to questions and
6 comments, if you have any. And while you're questioning
7 and commenting, there is the address that you can send
8 the public comments to. There's an e-mail address, a
9 U.S. mail address, hand-delivery address, and a fax
10 address.

11 MR. LITTLE: Thank you, Jen.

12 Okay. That was a lot of information there. We're
13 coming up on a break here.

14 Why don't we take a question here, and then we'll
15 move to the break. Please state your name and your
16 organization.

17 MR. WOOLSEY: Tom Woolsey, from the
18 Colville Tribes.

19 Just a small, minor thing. On this existing versus
20 new facility compliance, I'm wondering if you guys are
21 going to have some sort of definition of what constitutes
22 a new facility versus an existing one?

23 I know that a lot of tribes in the past, let's say
24 they've built a new facility, and then they've used
25 their -- the old one becomes a bingo hall or something

1 like that and then the new one is primarily Class III, so
2 is that a new facility?

3 Or let's say they tear one down and build on the
4 exact same footprint or they add significant square
5 footage through some sort of new wing or something like
6 that. Where do you draw the line as to what's new and
7 what's existing?

8 MR. LITTLE: That's kind of a very
9 unique question and probably something we'd have to think
10 about. It might be something you might want to put into
11 a comment and send it in. That would be very helpful.

12 MS. WARD: For the time being at
13 least, it should be covered in Part 549 that covers the
14 facility licensing.

15 MR. WOOLSEY: Okay.

16 MR. LITTLE: Is there a comment that
17 anyone would like to make right now?

18 If not, we're coming up on a break. How about we
19 come back at 20 minutes until 11:00. That will give you
20 time to, you know, take a break and maybe put together
21 some thoughts. We'll come back and take some questions
22 on either this part or Part 547. We'll see you at 20 to
23 11:00.

24 (Recess from 10:24 a.m. to
25 10:46 a.m.)

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2

CHAIRWOMAN STEVENS: Okay. If we can go ahead and get started. Hope everybody had an opportunity to return those e-mails and phone calls and get some coffee.

6

7

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So I want to hand it back over to Associate Commissioner Little so we can open the floor up for comments on the Part 543 that we just covered, or Part 547.

10

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14

MR. LITTLE: Thank you, Chairwoman.

Before I call for some questions, I just want to -- for the record, we did receive, during the break, written comments from the Spokane Tribe of Indians, and I just want to say, we'll put this in the record.

15

16

17

18

Okay. Is there any comments? Folks want to -- had a chance to think about everything that was in presentation and put together some thoughts on either Part 543 or Part 547? I'll open the floor.

19

20

MS. REPIN: Jennifer Repin, Snoqualmie Gaming Commission.

21

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24

I do have a question, since this is the largest area that's been talked about, is Internet gaming. Now, I know that that's the next relevant step in the progression of gaming.

25

How is that going to apply to the 547, with the

1 internal controls for the system, being that, if we want
2 to take, per se, a Bingo game online, you know, play, are
3 there thoughts of incorporating that into technical
4 standards now or is that going to be a step later, you
5 know, kind of more after the fact?

6 CHAIRWOMAN STEVENS: Well, right
7 now -- I appreciate that question. Right now there is
8 not enough information. There is certainly not any
9 federal legislation authorizing the NIGC to do anything
10 like that.

11 There are a number of bills out there right now that
12 don't name the NIGC. There are a number of other factors
13 that come into play that we just don't know. There are
14 too many unknowns and too many variables, so we wouldn't
15 be able to address that in what we're doing with these
16 parts.

17 So to answer your question, we'll probably -- if
18 anything does ever happen, it will probably have to
19 happen after the fact, because right now there's too many
20 unknown variables.

21 MR. DURHAM: David Durham, from
22 Tulalip Tribes of Washington.

23 In regards to the surveillance requirements for the
24 one-year retention period, is that going to be the
25 server-based retention, or would removable media such as

1 DVDs or CDs be sufficient for retention?

2 MS. WARD: It doesn't matter how the
3 tribes retain that surveillance, so long as they retain
4 it. If you've got a copy that's burned onto a DVD,
5 that's fine, or any other method you may have for storing
6 it.

7 MR. LITTLE: And the other question
8 would be, it's that one-year time period. That was a --
9 that was included in the Tribal Gaming Working Group
10 guidance document. That's really where we got the one
11 year. It's substantially longer than what we were
12 looking at.

13 We're really interested in hearing, is that too much
14 time, is that not enough time, or how does that affect
15 your facility. So if you're thinking about submitting a
16 comment, maybe think about addressing that point too. I
17 appreciate that.

18 Any other comments?

19 MR. BILLINGSLEY: Ken Billingsley,
20 from the Confederated Tribes of Warm Springs.

21 For the record, since we do have a transcriptionist
22 here, the tribe that I presently work for is very
23 interested in Class II gaming to offset set some of
24 the -- for economic development purposes, and they're
25 definitely very interested in getting some knowledge

1 about Class II gaming.

2 So we went to the extent of putting in a training
3 request well in advance, submitted it through the
4 Portland Region office, went through the channels, and
5 have not heard anything.

6 I'm in the position where I want the tribal council
7 to understand what they're getting into, just like every
8 other tribal council, I believe, wants to know what
9 they're getting into, how it's regulated, how it works,
10 so that they can make some -- put people to work and
11 generate some additional revenue for the tribal people.

12 We have not heard nothing about this training
13 request, so the chairman of the tribe wrote a letter to
14 Chairwoman Stevens. To this date, we have not heard a
15 single thing back. Tribal members aren't here today. I
16 know they have had some questions, but they felt like
17 they were shunned.

18 NIGC travels around. I'm a -- for the record, I'm a
19 former region director. I'm not a disgruntled employee.
20 This commission has gone around from the beginning.
21 Training is a priority. They've developed an ACE system,
22 assistance, compliance, and enforcement.

23 Well, we're asking for assistance so we can be in
24 compliance if the tribe chooses to go down this road, so
25 we don't have any enforcement action brought against us,

1 but we can't get it.

2 I understand that the letter is on the chief of
3 staff's desk, who denies or approves of all training. We
4 haven't heard one thing from the initial request, whether
5 it's going to be granted, denied, nothing.

6 Transparency -- where is the transparency? And
7 oddly, a chairperson's -- the chairman of the tribe's
8 written letter -- this tribe is very interested in this
9 stuff. They took time, set aside time to attend this
10 training. We haven't heard a word.

11 I beg of this commission to take all these requests
12 seriously, to honor these requests when they are needed,
13 and first and foremost, respond to these tribal leaders.
14 My opinion of that, for what it's worth, it's
15 unprofessional when you don't even respond to tribal
16 people.

17 Being a former tribal leader, United States
18 Government has a trust responsibility. The National
19 Indian Gaming Commission is part of that federal system,
20 part of the Department of the Interior that needs to
21 respond to tribal leaders. They're there for the benefit
22 of the tribes.

23 So with that, I wanted to make this on the record.
24 And I would like those questions answered so I can take
25 the answers back to the tribal chairman on why this

1 request, number one, wasn't even -- if it wasn't granted,
2 what was the reasons for it. Can we get it later on down
3 the road. And the chairwoman, why the tribal chairman's
4 letter was not ever answered, written, sent in.

5 Thank you very much.

6 CHAIRWOMAN STEVENS: Well, thank you
7 for your comment, Mr. Billingsley. I do want to say we
8 would be happy to talk about this as an aside.

9 I appreciate that there is some tie to 543 and 547
10 as the Confederated Tribes of Warm Springs is considering
11 whether or not to go into Class II gaming. Although not
12 specifically relevant to the proposed rules at hand, I
13 can appreciate there is somewhat of a tie here.

14 And for the record, I do want to say, I do have your
15 letter. I do have the chairman's letter. There has been
16 communications back and forth, not denying the request,
17 but actually trying to schedule it at a time that is
18 appropriate for both the tribe and the NIGC with our
19 staff's currently established calendar.

20 I believe that there is an outstanding question to
21 the tribe from the NIGC about what time would be
22 appropriate for the tribe. So just for the record, I do
23 want to say that there has been communication back and
24 forth, and I'd be happy to talk perhaps to the chairman
25 myself directly to make sure that it is clear that we are

1 handling this, and we do not deny requests. We gladly
2 and happily schedule them as appropriate for everybody's
3 calendar involved.

4 So with that, I would like to defer this
5 conversation to after the consultation and allow for the
6 time -- the remainder of the time to go to the
7 individuals who do want to speak directly to the proposed
8 rules that are published right now.

9 If not, I would encourage everybody again to read
10 the preamble and -- you know, also it's not just for
11 comments. If you do think of something, or in your
12 discussion, as you go back to your tribal council, you
13 can also contact these numbers.

14 You can e-mail us. You can call us. You can talk
15 to Jen or Mike or any of us, if the question does come up
16 or you need some clarification as to what's published
17 right now. We would be happy to answer your questions if
18 that will help inform your comments, so that it's
19 clear -- there's a clear understanding of what's being
20 proposed. So it's not just for comments. It's open to
21 questions and clarification.

22 MR. HARJU: Again, my name is Phil
23 Harju, from the Cowlitz Tribe.

24 I want to extend my thanks to the people of Squaxin
25 Island for hosting us here in their territory.

1 I have just one question on -- I know you have
2 published in the Federal Register. Do you have the
3 proposed rules also on your website too so that people
4 don't have to dig it out of the Federal Register? They
5 can go right to your website?

6 I also want to thank the entire commission and staff
7 for coming out and being -- making this presentation and
8 answering our questions. I want to let the chairwoman
9 know, I had a very nice conversation with Jennifer, and
10 she was very knowledgeable and helpful on my questions,
11 and I thank her personally for her work. And again,
12 thank you for coming out and being here in Indian
13 Country.

14 CHAIRWOMAN STEVENS: Thank you. We
15 all appreciate your kind comments very much and also
16 appreciate the Squaxin Island's generosity in hosting, as
17 they always do.

18 MR. HARJU: Your website is what?

19 CHAIRWOMAN STEVENS: Our website is
20 nigc.gov. And on the right side, the announcement, press
21 releases, anything that we do is -- that has quick
22 access. There's links usually right there that lead you
23 right to the electronic Federal Register. Right now it's
24 the top two on the right under Current Activities.

25 On the left is Tribal Consultation, and under 2011,

1 2012 is everything that we've done from November 2010
2 until now: transcripts, comments, drafts, proposed
3 rules, and even final rules. So there's everything on
4 one side, and then specifically the Federal Register
5 notices on the right, so you can find them there.

6 I do also want to echo your appreciation for our
7 staff because we have really worked on staff very hard
8 over the past -- at least the two years in the time that
9 this commission has been here, because we have had such
10 an ambiguous agenda and schedule.

11 And not just, you know, our staff, but to all of you
12 for keeping up with us, all the tribes' participation and
13 contribution to this process because without that -- you
14 know, as one of the three regulators at the table,
15 without that, we don't have a -- we can't make a fully
16 considered, well-informed decision about regulations that
17 affect everybody.

18 MR. HARJU: Thank you.

19 CHAIRWOMAN STEVENS: If there are no
20 other questions or comments at this time, I want to again
21 thank everybody. I want to hand it over to the associate
22 commissioners for their last words.

23 MR. LITTLE: Thank you, Tracie.

24 Like I said, look forward to your comments. You all
25 set that bar very high during the discussion comment

1 period time, so we'll be expecting some really good,
2 thoughtful comments.

3 I appreciate the time that you all have taken out of
4 your day to come here, and I really appreciate the -- you
5 know, your participation because this is a joint effort
6 to make sure that, you know, we can strengthen these
7 regulations and continue to provide a regulation to keep
8 this industry strong. I want to thank you all today and
9 wish you safe travels.

10 MS. COCHRAN: I, too, echo the same
11 sentiments of Commissioner Little. I appreciate your
12 time. I know that your time is valuable and we've taken
13 you away from your normal duties. We thank again the
14 Squaxin for their hospitality, and I wish you safe
15 travels and look forward to hearing your comments.

16 CHAIRWOMAN STEVENS: Okay. Well, with
17 that, on behalf of the NIGC, we want to thank you for
18 your attention and participation. And again, we look
19 forward to your contribution to this process. Again, if
20 you have any questions, feel free to contact us.

21 In wrapping it up, please have safe travels. Thank
22 you.

23 (Proceedings concluded at
24 11:02 a.m.)

25

1 STATE OF WASHINGTON) I, Barbara L. Brace, CCR, RPR,
) ss a certified court reporter
2 County of Mason) in the State of Washington, do
 hereby certify:

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4

5 That the foregoing proceedings were taken before
me and completed on July 19, 2012, and thereafter was
6 transcribed under my direction; that the foregoing is a
full, true and complete transcript of the proceedings;

7 That I am not a relative, employee, attorney or
8 counsel of any party to this action or relative or employee
of any such attorney or counsel and that I am not
9 financially interested in the said action or the outcome
thereof;

10 That I am herewith securely sealing the said
11 transcript and promptly delivering the same to
Attorney Rita Homa.

12 IN WITNESS WHEREOF, I have hereunto set my hand
and affixed my official seal on the 25th day of July, 2012.

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