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November 29, 2004

Mr. Nelson W. Westrin, Vice Chairman  
National Indian Gaming Commission  
1441 L Street NW Suite 9100  
Washington, DC 20005

Re: Class-II Standards

Dear Vice Chairman Westrin:

I would like to take this opportunity to thank the NIGC for its efforts in the development of Class II gaming standards. As a manufacturer of electronic bingo equipment, we appreciate the proactive role the NIGC has taken, as well as the efforts the Commission has undertaken to procure industry input. In this light, we would like to submit the following comments for your consideration.

**Specific Comments.**

**Section (3)(a)(viii)** "...Players must have the option of changing the card..."

The specific requirement of being able to change cards would appear to be arbitrary and contradictory to conventional bingo games, wherein players have no option of selecting specific bingo cards. In conventional bingo games, players can only determine the quantity (and the "color", i.e., the "level") of paper and/or electronic bingo cards to be purchased and can not select specific bingo cards. We believe the Standard should be restated as an option rather than a mandatory feature.

**Section (3)(d)(ii)(a)** "The same value prize must be awarded to a subsequent game winning player in the game."

The specific requirement of prize award would appear to be arbitrary and inconsistent with conventional rules of bingo. For example, in a "coverall" game, the prize won by a player often depends on the number of "balls" called in the game, e.g., a player "covering" her bingo card in 51 numbers may win higher prize than a player who covers his card in 52 numbers. Assuming a player "sleeps" the opportunity to announce bingo in 51 numbers, the next player who announces a bingo in 52 numbers will be paid a smaller prize than the prize "slept" by the first player. The Standard should be restated to specifically allow the paying lower prizes to "second chance winners."

**Section (3)(e)(ii)** "... by selecting an amount to wager..."

The Standard would appear to be arbitrary and inconsistent with conventional rules of bingo. For example, a conventional bingo game frequently has only one (1) prize "level" ("color.") In such a game, a player has no opportunity of "selecting a amount of wager."

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The Standard should be restated as an option to select an amount of wager rather than a mandatory feature.

**Section (6)(e)** "... can not serve as the means for a player to notify the bingo game operator..."

This specific requirement of not being the means to notify the bingo operator would appear to be arbitrary and inconsistent with American with Disabilities Act (ADA) For example, a handicapped bingo player may have no means "to notify the bingo game operator" other than the "card minder". The Standard should be restated to comply with ADA.

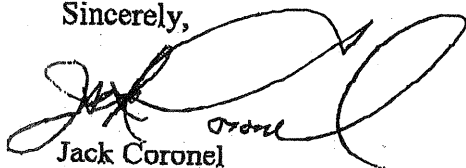
### General Comments.

In light of evolving technology, nothing in the Standards should prohibit multifunctional player devices complying simultaneously with several parts of the Standards. For example, the devices that concurrently serve as "card minding devices" (defined in Section 6 of Standards) while also capable of playing Class-II "themed" games (defined in Section 3 of Standards) should be allowed. Such devices may for example, allow players to play "themed" games before bingo session and subsequently play the conventional bingo session games.

In addition, nothing in the Standards should prohibit wireless gaming technology. In particular, wireless portable player devices functionally complying with respective Sections of Standards and securely communicating with the central file server should be allowed. This technology is central to our communication system (cellular telephones), banking facilities and military operations.

We would be glad to engage into a productive dialog with you regarding any of the above comments.

Sincerely,



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