



**OFFICE OF THE GOVERNOR**

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BILL ANOATUBBY  
GOVERNOR

October 30, 2017

Ms. Elizabeth Appel, Director  
Office of Regulatory Affairs and Collaborative Action  
Bureau of Indian Affairs  
U.S. Department of the Interior  
1849 C Street, N.W., Mailstop 3642-MIB  
Washington, D.C. 20240

Dear Ms. Appel:

Included with this letter are our comments relating to the Department of the Interior's (DOI) announced intention to seek the modernization of the Indian Trader regulations, i.e., 25 C.F.R. part 140. These comments respond to the DOI "Dear Tribal Leader" letter of September 8, 2017, and supplement what we previously submitted on this topic under our letter dated April 6, 2017.

The DOI is delegated broad authority under 25 U.S.C. § 262 with respect to the regulation of Indian country economic development. However, the current Indian Trader regulatory systems continue a bureaucratic paternalism that does little to support true tribal self-determination. We would accordingly support administrative efforts to replace this system with one that affirms tribal self-government.

Thank you for the opportunity to comment. We would look forward to continuing this discussion with the DOI, if the Indian Trader regulation initiative moves forward.

Sincerely,

Bill Anoatubby, Governor  
The Chickasaw Nation