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Jackpot In The Skies: Overcoming Challenges Of How FAA Part 139 Airports And American Indian Tribes Can Cooperate In The Implementation Of Gaming

Noah Reese Gunter

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JACKPOT IN THE SKIES: OVERCOMING CHALLENGES OF HOW FAA PART 139
AIRPORTS AND AMERICAN INDIAN TRIBES CAN COOPERATE IN THE
IMPLEMENTATION OF GAMING

by

Noah Reese Gunter

Bachelor of Science, Elizabeth City State University, 2021

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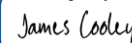
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Name: Noah Gunter

Degree: Master of Science

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Mark Dusenbury, Ph.D.

James Cooley, Ph.D.

Brandon Wild, Ph.D.

      This document is being submitted by the appointed advisory committee as having met all the requirements of the School of Graduate Studies at the University of North Dakota and is hereby approved.

Chris Nelson, Ph.D.
Dean of the School of Graduate Studies

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Noah Gunter
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ABSTRACT

This project sought to explore and inform the current gaming use at FAA Part 139 airports and how gaming could be used for other airports across the US. This research also explored the effects of a partnership between American Indian tribes and the airports that would operate gaming within their facilities. To do so, a qualitative method was completed with case studies and narrative research through a variety of data review and physical observations. By looking at current and proposed gaming locations at FAA Part 139 airports and how American Indian tribes near airports could use gaming within airports to benefit tribal communities, this research showed that American Indian tribes would benefit from incorporating gaming into airports. By utilizing current gaming frameworks and with a successful implementation, this gaming would be able to provide further revenue for tribes that participate and allow for other connections that would help both the tribe and airport.

KEY DEFINITIONS

Class I, II, and III Gaming- The specific classifications of gaming that determine the complexity of the gaming and how much regulation is needed. (National Indian Gaming Commission, 2022)

Class I Gaming- "Traditional Indian gaming and social gaming for minimum prizes." This game type would be games that tribes have traditionally done and offer minimal prizes as they would be primarily ceremonial. Because of the small prize and traditional origin, this gaming class is regulated and controlled by the tribal government. (National Indian Gaming Commission, 2022)

Class II Gaming- Gaming is entirely by chance and allows everyone to have an equal chance of winning. The only games allowed in this class are bingo and non-banked card games. Bingo is a game of chance where numbers are matched, and everyone has an equal chance of winning. Bingo in Class II gaming can use "electronic, computer, or other technological aids" for its operation and must be played at the same location as where the game is being played. Non-banked card games are card games that are "played exclusively against other players rather than the house or a player acting as a bank." This means that players are only playing against each other, and the house has no role in the game. Because of the possible generation of revenue from this class of gaming, Class II gaming has some external regulation from the state the reservation is in as the tribal government can regulate and operate if the state approves of such gaming on the reservation and the tribe must have a gaming ordinance approved by the National Indian Gaming Commission (NIGC). (National Indian Gaming Commission, 2022)

Class III Gaming- all forms of gaming not covered under Class I and II. Though this is broad, it is important for the broadness as casinos operate a wide variety of gaming for players to have a chance of winning a prize. These games include "slot machines, blackjack, craps, and roulette" and to ensure players have a chance as winning, this class of gaming has three steps to be allowed on a tribe's reservation. The steps are as follows:

"First, the form of Class III gaming the tribe wants to conduct must be permitted in the state in which the tribe is located. Second, the tribe and the state must have negotiated a compact that has been approved by the Secretary of the Interior, or the Secretary must have approved regulatory procedures; and third, the tribe must have adopted a tribal gaming ordinance that has been approved by the Chair of the NIGC."

Though these steps have been explained, there is further complexity in the regulations and operations of Class III gaming locations as each state have a separate set of laws and the federal government must work with both the state and the tribe to ensure such gaming can be successfully implemented and regulated. (National Indian Gaming Commission, 2022)

FAA Part 139 Airports- Airports that serve scheduled and unscheduled air carrier aircraft with more than 30 seats and scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats. (Federal Aviation Administration, 2023)

Gaming- The practice of people playing games that are awarded based on chance. (National Indian Gaming Commission, 2022)

Gaming Locations- Places in which gaming occurs. (National Indian Gaming Commission, 2022)

Tribal Compact- An agreement made between an American Indian tribe, the state the tribe is in, and, depending on the class of gaming being agreed upon, the federal government to allow for gaming to occur on the tribe's land. (USAGov, 2022)

Tribally Inclusive Geographic Area (TIGA)- A culturally, politically, or geologically defined geographic region with one or more of the following within its recognized area: an Indian reservation, Indian Trust Land, tribally owned land registered as such with the United States, or land identified as tribally owned or allocated and stated as such within legally recognized documents. Land owned in full or part by members of Indian tribes or Indian owned corporations but not deeded to the tribal member's or members' tribe is considered private citizen property and is not considered TIGA land. (Weeks, 2023)

CHAPTER I

INTRODUCTION

Airports can look at ways to not only accommodate passengers, but to also provide revenue for the airport and American Indian tribes. Some airports have been able to find this in the form of gaming within their terminals. In the United States (US), there are currently two airports that use gaming within their terminal and have served as an inspiration as other states look at implementing gaming throughout airports in their states (CAPA, 2022). Along with looking at airports that have proposed gaming within their operations, this research also hopes to look at how American Indian tribes could work in helping to implement gaming at these airports and what this gaming can do for tribal communities.

American Indian tribes are being observed as a partner for gaming at FAA Part 139 airports because of their experience with gaming and cooperation with aviation. Throughout the US, tribes can use gaming as a revenue source as they have reached an agreement with the state the gaming location operates in, the National Indian Gaming Commission (NIGC), and the Bureau of Indian Affairs within the Department of the Interior. With this experience, tribes can reach an agreement with airports to operate gaming machines that can benefit both the tribe and airport as not only can both generate revenue that could be used for airport or tribal improvement projects but also allow for marketing for the tribe. This research detailed how this can occur.

Purpose

This study intends to explore the possibilities, challenges of implementing gaming at airports that have based commercial operations, primarily FAA Part 139 airports, how American Indian tribes can assist in its implementation and operation, the challenges to be faced in the implementation of gaming at FAA Part 139 Airports, and the benefits gaming could bring for both the airport that is looking to implement gaming and the tribe(s) that strive to implement gaming. This research is designed to integrate three different disciplines:

      1. Aviation and airports

      2. American Indian tribal gaming

      3. Public health and safety.

Specifically, this paper explores the possibilities, challenges, and effects related to the implementation of gaming at airports with commercial operations. Also, the economic impacts of gaming operations at airports are discussed.

Additionally, American Indian tribal sovereignty and how it is a significant factor in airport gaming is reviewed. Also discussed are ways American Indian tribes can partner in current or future gaming implementation and operations, and how the economic impact of gaming at these airports can be for both airport operations and tribal wealth.

Finally, health and safety impacts of airport gaming to pilots, air crews, aircraft service operations personnel, and passengers, are identified and discussed.

Due to the limited experimentation and implementation of American Indian gaming at airports, it is essential to gauge the possibility of their implementation before large scale use at proposed airports begin. This will ensure any problems that can be addressed and discussed before they become costly during such implementation.

Research Questions

1. How can the framework of current gaming operations at FAA Part 139 Airports be implemented FAA Part 139 Airports across the US?

    a. What factors hinder the implementation of gaming machines at FAA Part 139 Airports and how can these factors be addressed?

    b. What are previous attempts at installing gaming at FAA Part 139 Airports and what has prevented its development?

2. To what extent can American Indian tribes contribute to the implementation of gaming at FAA Part 139 airports and the benefits it can bring them?

    a. What experiences with airports and gaming can American Indians use to implement gaming at FAA Part 139 Airports?

    b. How can American Indian tribes implement the gaming classes at FAA Part 139 Airports?

CHAPTER II

RESEARCH METHOD

This research was conducted using a qualitative research approach and constructivist worldview, using experiences and existing foundations to expand on concepts, by using existing historical data, existing case studies, data collected from unobtrusive observation at airport field sites, and conference attendance and discussion participation, which will be discussed in the data review and appendix. The appendix discusses sites visits that coincide with travels made during the time of research and how they helped with seeing successful gaming at airports. These visits also helped show ways other airports across the US could incorporate gaming. Along with the appendix, informal discussions were made with aviation professionals, students, and American Indian tribal leaders involved in tribal sovereignty, Indian gaming, and casino health and safety to ensure a wide variety of knowledge for the research. This study identified four primary factors conducive to the placement of gaming machines. The four factors are:

1. Large Post Security Terminal Area

2. Location Options within Airport Operations

3. Airline Hub

4. High International Passenger Counts.

This qualitative research used 7 case studies to follow the current and proposed gaming operations at FAA Part 139 airports, the classes of gaming American Indian tribes offer and how they are regulated. This will help show how current American Indian gaming operations can be

incorporated into airport gaming operations. By using this design, data can be collected through a content analysis on gaming at airports and how airports and American Indian tribes can work together for such gaming. It is also important to note that gaming at airports has only recently expanded. By following this research design, the case studies will help to create a framework and provide an understanding of how FAA Part 139 Airports and American Indian tribes can work together to implement gaming at these airports across the US in a way that all parties involved can benefit.

Data Review

The data review is composed of scholarly articles, news reports, organizational releases, and non-obtrusive field site visitations. These reviews will help explain how airports use gaming within their terminals and the outcomes that gaming has had for these airports so far along with attempts made to implement gaming within airport operations in the US. Data collected was compiled into text discussions and further summarized into tables for analysis where applicable. Harry Reid International Airport, Green Bay Austin Straubel International Airport, and states that have previously shown interest in gaming at their airports will be discussed in the following case studies. These are important to look at as they are the only airports in the US that offer dedicated gaming within their operations and have had an extensive history with gaming. Because of the success of gaming at these two airports, several states have approved or considered implementing gaming at their airports, which were also reviewed and discussed in this study.

CHAPTER III

RESULTS

Case Studies

Case Study 1: Harry Reid International Airport

Harry Reid International Airport, formally McCarren International Airport, in Las Vegas, Nevada has had gaming in their airport in the form of slot machines for 37 years (Garbuno, 2023). This has been due to the state of Nevada's openness to gaming that is protected under state law in most areas. This airport was also visited during the research and the visit is detailed in Appendix B. Currently, the operators of these slot machines, Michael Gaughan's Airport Slot Concession, Inc., have been able to generate one billion dollars in revenue from these machines as of 2022 (Garbuno, 2023). This has allowed for an average gross revenue of 39.9 million dollars from over one thousand machines with 34.4 million of that revenue going back to the airport (Garbuno, 2023). This revenue has then been used for airport operation improvements and other airport projects.

Case Study 2: Reno-Tahoe International Airport

Reno-Tahoe International Airport in Reno, Nevada, is a vital airport to observe for implementing gaming within their terminals. The airport currently has 250 gaming machines within its operation (Casino City, 2023), with one and a half million dollars of revenue generated between 2019 and 2022 (Reno Tahoe Airport Authority, 2022). These machines are operated by a variety of companies, primarily International Gaming Technologies (Casino City, 2023). With

a partnership from American Indian tribes, gaming at airports located in states where gaming is illegal can be possible.

Case Study 3: Green Bay Austin Straubel International Airport

In 2021, a visit was made to Green Bay Austin Straubel International Airport. During the time there, the airport was visited, and a discussion occurred with the assistant airport director at the time. This site visit is discussed more in Appendix C. It was discovered that Green Bay Austin Straubel International Airport is within a Tribally Inclusive Geographical Area (TIGA). It is partially within the boundary of the Oneida Tribe of Indians of Wisconsin. The tribe and the Airport Authority, which has Oneida tribal representation, is an example of a tribe that has actively reviewed how gaming at an international airport could work. At this time, the Oneida tribe and Green Bay Austin Straubel Airport are recognized as leaders in creating a framework of an understanding of how FAA Part 139 Airports and American Indian tribes can work together to implement gaming at TIGA airports across the US in a way that both parties can benefit (Appendix C). This can be seen in the incorporation of gaming machines at Green Bay Austin Straubel International Airport in 2022. The Oneida Tribe of Indians of Wisconsin was allowed to have limited machines in the airport for passengers to use. This is discussed further in the appendix under Site Visit Three for Green Bay Austin Straubel International Airport. Such implementation has shown that interest in gaming and gaming at airports is growing. This can also be seen in the record revenue generated from US casinos in 2022 (American Gaming Association, 2023). The American Gaming Association (AGA) reported that the highest revenue generated by commercial gaming in history occurred in 2022, with 60.42 billion dollars generated from slot machines, table gaming, sports betting, and online gaming (American

Gaming Association, 2023). With 34.19 billion of the 60.42 billion generated from slot machines alone, airports and tribes can partner to implement gaming machines throughout the airport (American Gaming Association, 2023). These would be the type of machines that made over half of all revenue generation for gaming in the US. Along with the high revenues generated by gaming amongst American Indian tribes and at airports such as Reno-Tahoe and Harry Reid International, states have shown interest in gaming at airports in the form of legislation (Collins, 2022).

Several states have shown interest in gaming at airports in recent decades, notably Pennsylvania (Levy, 2018), Illinois (Illinois Gaming Board, 2019), New Jersey (Johnson, 2016), and Maryland (Collins, 2022). This interest has grown steadily as tourism increased in these states. Table 1 shows the progress of these interests and their status:

Table 1

U.S. Airports with Current or Proposed Gaming

A. Current		
Code	**Airport**	**Status**
LAS	Las Vegas, Harry Reid International Airport	Active
RNO	Reno Tahoe International	Active
GRB	Green Bay Austin Straubel International Airport	Active, Limited
B. Currently Approved, and Undeveloped Proposals		
Code	**Airport**	**State**
ORD	Chicago	IL

Table 1 cont.

MDW	Midway	IL
ABE	Lehigh Valley International Airport	PA
LBE	Arnold Palmer Regional Airport	PA
AOO	Altoona Blair County Airport	PA
AVP	Wilkes Barre Scranton International Airport	PA
BFD	Bradford Regional Airport	PA
DUJ	Dubois Regional Airport	PA
ERI	Erie International Airport	PA
FKL	Venango Regional Airport	PA
IPT	Williamsport Regional Airport	PA
JST	John Murtha Johnstown Cambria County Airport	PA
MDT	Harrisburg International Airport	PA
PHL	Philadelphia	PA
PIT	Pittsburgh	PA
SCE	University Park Airport	PA

C. Previously Proposed

Code	Airport	State	Most Recent Status
BWI	Baltimore Washington International T. Marshall	MD	Rejected 2022
ACY	Atlantic City International	NJ	Rejected 2016

Note: Interactive Gaming Via Multiuse Non-Personal Computing Devices, Such as Tablets, At

A Qualified Airport in an Airport Gaming Area Approved in Pennsylvania

Created by: Gunter, Noah and Mitchell, Dr. Lloyd

Case Study 4: Pennsylvania

In 2017, the General Assembly of Pennsylvania passed House Bill 271, allowing for gaming at, among other things, airports (Levy, 2018). By expanding gaming locations, Pennsylvania could bring in more revenue for state projects and regulate gaming to ensure that players have an equal chance at winning and the gaming operations are fair. The following list shows the airports that could have gaming operations in Pennsylvania if they choose to do so:

- Altoona-Blair County Airport- AOO
- Arnold Palmer Regional Airport- AEE
- Bradford Regional Airport- BFD
- Dubois Regional Airport- DUJ
- Erie International Airport- ERI
- Harrisburg International Airport- MDT
- John Murtha Johnstown-Cambria County Airport- JST
- Lancaster Airport- LNS
- Lehigh Valley International Airport- ABE
- Philadelphia International Airport- PHL
- Pittsburgh International Airport- PIT
- University Park Airport- SCE
- Venango Regional Airport- FKL
- Wilkes-Barre/Scranton International Airport- AVP
- Williamsport Regional Airport- IPT

Source: Pennsylvania Gaming Control Board

These airports would have the option of utilizing gaming within their operations. If they were to do so, they would have to follow the regulations given by the Pennsylvania Gaming Control Board (PGCB). Before gaming could be allowed at the airport, paperwork would need to be submitted for approval and a one-time fee would need to be paid before operations could begin. The one-time fees are as follows:

- $2,500,000: An international airport located partially in a county of the first class and partially in a county contiguous to a county of the first class

- $1,250,000: An international airport located in a county of the second class

- $500,000: An international airport located in a county other than a county of the first or second class

- $125,000: A qualified airport that has not been designated an international airport

Source: (Lucas, 2019)

The classes given are about the number of operations and population the airport undergoes and services. Though these prices could be high, airports could partner with those with a gaming license with the state and subsequently reduce their fee. This could be a casino that currently operates and American Indian tribes that have gaming operations in the state to allow for American Indian gaming within these gaming operations at airports. After completing the necessary requirements for being approved for gaming at airports, airports must follow regulations given by the PGCB. Under these regulations, the PGCB requires that airports only use "interactive gaming via "multiuse computing devices at a qualified airport in an airport gaming area in this Commonwealth."" (Lucas, 2019). This would mean tablets in a fixed position, to prevent theft, which allow for table games to be played such as poker and roulette within an airport gaming area. Slot machines would not be allowed to operate within airports; however, they could still be played on these tablets among other games provided. These tablets would not only allow for gaming but would also complete age verification and allow for internet access, along with flight status updates. The following state reviewed for this research was New Jersey.

Case Study 5: Illinois

Illinois passed the Illinois Gambling Act in 2019 (Illinois et al., 2019) to provide entertainment and further revenue for the state (Illinois Gaming Board, 2019). In response to this act, the

Illinois Gaming Board commissioned Union Gaming Analytics to review the feasibility of gaming in Chicago. Among the reports detailing the placement of gaming machines around Chicago, including at O'Hare and Midway International Airports (Illinois et al., 2019). Though not the focus of the feasibility study, the study stated that with the placement of 500 machines amongst each airport and allowing for an assumed win per day of $200, these machines could generate an annual gross receipt of 37 million dollars (Illinois et al, 2019). This would equate to $37 million a year or $74 thousand a machine before taxes by 2025 (Illinois Gaming Board, 2019). The success of these machines within the study was based on the use of machines with international airports at Las Vegas and Reno, Nevada, and the opening of a casino in Boston, Massachusetts that used gaming machines within proximity of Boston Logan International Airport (Illinois et al, 2019). Though this study offered a comprehensive overview, it is limited as it has no precedent for operations in Illinois and plans have been put on hold for operations at the airports until further notice.

Case Study 6: New Jersey

New Jersey showed interest in utilizing gaming at airports due to the interest in bringing more gaming to the city of Atlantic City, a central gaming hub on the eastern coast of the US. In 2016, State Assemblyman Tim Eustace introduced legislative measure ACR177 that would allow New Jersey voters to vote to change the state's constitution to allow for gaming to be permitted at Atlantic City International Airport (Johnson, 2016). This was felt to be needed as four of the twelve casinos had closed in Atlantic City and extra sources of revenue were being looked at to keep the city alive. The mindset of implementing gaming at the airport is that passengers waiting would use these machines and generate extra revenue for the city was also the exact reason for

the measure's introduction (Johnson, 2016). Though the measure was shown interest, it did not pass as it would have seen to have been a competition with Atlantic City's casinos and could have introduced gaming to airports in Trenton and Hoboken in the northern part of the state.

Case Study 7: Maryland

In February 2022, House Bill 733 was introduced to Maryland legislation to allow gaming operations to commence at Baltimore-Washington International Thurgood Marshall Airport (Collins, 2022). This bill would have allowed for over three thousand gaming machines at the airport with some of the revenue generated from the machines going towards the Maryland Education Trust Fund and local community. Though the bill showed some promise and interest and had been introduced in the past, it did not pass. One issue from this legislation was that the Maryland Aviation Administration stated that it could only hold a thousand machines at the airport instead of the three thousand given in the bill (Collins, 2022). This would have decreased the revenue figures that would have been thought of for the machines. Another issue was the competition from local casinos and other gaming options. Besides these obstacles, some believe it is still a viable option that such legislation will be passed soon. Though airports that have made previous attempts to implement gaming within their terminals have been looked at, the advantages that airports have that have not looked at incorporating gaming into their operations should also be looked at for proper considerations and successful implementation.

Airports across the US can implement gaming within their terminal and should look at the factors that would be conducive to gaming implementation. The table below is based on observations made during travel through such airports and the advantages that each airport has:

Table 2.

Airports With Factors Conducive for Airport Gaming

Airport Identifier	Airport City	Factor
ATL	Atlanta	Several Location Options Post Security, Airline Hub
DEN	Denver	Large Post Security Terminal Area, Airline Hub
DTW	Detroit	Large Post Security Terminal Area, Airline Hub
EWR	Newark	Large Post Security Terminal Area, Airline Hub
HNL	Honolulu	Large Post Security Terminal Area, Airline Hub
JFK	New York	Large Post Security Terminal Area, Airline Hub, High International Passenger Counts
LAX	Los Angeles	Large Post Security Terminal Area, Airline Hub, High International Passenger Counts
MCO	Orlando	Large Post Security Terminal Area, Airline Hub
MIA	Miami	Large Post Security Terminal Area, Airline Hub, High International Passenger Counts
MSP	Minneapolis	Large Post Security Terminal Area, Airline Hub
SEA	Seattle Tacoma	Several Location Options Post Security, Airline Hub, High International Passenger Counts

Note: This graph is only a list of airports visited or review and is not a comprehensive list of all

FAA Part 139 Airports that have factors conducive to gaming

Created by: Gunter, Noah and Mitchell, Dr. Lloyd

As shown above, many of these airports have large areas that can offer travelers a chance to game while waiting for their flight. Based off observations detailed in the appendix, these large spaces are necessary as the machines can be large and numerous machines can be placed to accommodate demand and advertise themselves in these spaces. It is also helpful that many of the airports listed are going through revitalization and renovation projects to modernize terminals, including allowing for more open spaces that could accommodate gaming machines. Though gaming has potential among many of the FAA Part 139 Airports in the US, some factors limit such implementation at gaming. Furthermore, gaming within these airports can be adequately implemented due to:

- Large Post Security Terminal Area

- Several Gaming Machine Placement Location Options Throughout Airport Terminal

- Airline Hub

- High International Passenger Counts

A large post-security terminal area, such as an expansive lobby or extended, wide terminal wing area with a centralized gathering location, promotes social gathering and interaction. These social factors in turn, invite passengers to a shared interaction experience. Seattle Tacoma International Airport is an example of an airport terminal with a significant post-security terminal area.

Terminals that are large often have several underused locations where gaming devices can be easily located as seen through our airport observations detailed in the appendix. An example of an airport that has expanded and thus has several locations suitable for gaming machine placement options is Minneapolis St. Paul International Airport.

An airport that serves as an airline's major hub is conducive to gaming machine placement because large numbers of passengers are transported to these hubs to transfer onto the flight to their destination. These transfer times can be up to four hours long; extensive delays and weather factors extend the hours spent in the terminal delays can extend overnight (Weeks, 2023). With this extra time, passengers can be enticed to game and further increase the gaming revenue for both the operators and the airport. An example of an airline airport hub is Atlanta's Hartfield Jackson International Airport.

An airport with many international passengers arriving, originating, or passing through provides opportunities for international passengers to expend remaining US Dollars on goods and services. Los Angeles International Airport's Tom Bradley International Terminal is an example of an airport terminal with a high international passenger count. These factors help with gaming at airports, there are issues that would hinder such gaming.

Gaming at airports faces issues in its implementation from airport management, the public, and from state and federal government. The following list highlights the key issues facing the implementation of gaming at airports:

- Legislation
- Public Acceptance of Implementation
- Cost of Implementation
- Lack of Interest from the Gaming Community
- Health and Safety

Legislation is an issue as each state in the US has a separate set of laws that allow, limit, or prohibit gaming within their borders (Tribal Alliance of Sovereign Indian Nations, 2023). Many states prohibit gaming; however, this will be addressed later as alternatives are available for this limiting or prohibiting. The next issue to review is the public acceptance of gaming at airports. Some people would see gaming as unsafe and unethical to operate. Like the North

Carolina Education Lottery and the planned use of gaming revenue for Baltimore International, if gaming at airports were to show that the revenue generated went to maintaining the airport or social programs to better the community around the airport, the public would be able to support having gaming within airports (Collins, 2022).

The next hindrance would be the cost of implementation. The implementation at airports could be very costly to follow the guidelines of state gaming laws (National Indian Gaming Commission, 2022). This is why airports should partner with gaming organizations, such as the National Indian Gaming Commission, and American Indian tribes that offer gaming to offset the cost and allow for American Indian tribes to market themselves and generate another source of revenue. This issue is also related to the final problem of lack of interest from the gaming community.

Gaming organizations operating in the US could see this as unprofitable or too problematic to begin or set up in. This is where feasibility studies are important as the one provided by Union Gaming Analytics for the Illinois Gaming Board helped to show the possibility of gaming and how it would benefit everyone involved. This is important as airports can use feasibility studies to indicate the profitability and possibility that gaming at the airport can do for all involved.

Finally, there are health and safety risks for any airport that has gaming machines. Protocols protecting and promoting health and safety related to gaming machines at airports can be enhanced. These protocols, although necessary at a variety of levels: airline, airport, state, tribal, and federal, were challenging to identify and if identified, some were inconsistent or inapplicable, and in some cases, health and safety protocols related to airport gaming seemed to be elusive, or even nonexistent. Now that the history of gaming at airports within the US and

what challenges its expansion would face has been looked at, it is now essential to look at an overlooked and vital partner that can help provide availability for gaming at airports, American Indian tribes.

American Indian Gaming and Experience

American Indian tribes' expertise and cooperation would be vital for the implementation as many American Indian tribes offer gaming within their tribal lands and some even operate airports within their lands. The National Indian Gaming Association lists three classes of gaming. Class I is "traditional Indian gaming and social gaming for minimum prizes," Class II is gaming that is done by chance where the gaming center and player have an equal chance of winning and Class III is all gaming that is not covered under Class I or II, which would include slot machines (National Indian Gaming Commission, 2022). Along with looking at gaming and those that have gaming operations, tribal compacts are important to look at. Tribal compacts are agreements made between the American Indian tribe, state that the tribe is in, and, depending on the class of gaming, the federal government for gaming operations on the tribe's land. The tables below show how many American Indian Tribes operate gaming on their tribal lands, what regulation go into each class of Indian Gaming, the number of tribal compacts in the US, and a list of American Indian-operated airports in the US:

Table 3

General Overview of American Indian Data

Number of	Factor Researched	As Of
574	Total # Of Federally Recognized Indian Tribes *	March 2023

Table 2 cont.

251	Total # Of Federally Recognized Tribes with Active Class III Gaming *	March 2023
518	Total # Of Class III Gaming Facilities **	March 2023
30	States With Indian Casinos *	March 2023
65	State With Most Class III Gaming Tribes: California *	March 2023
143	State With Most Indian Casinos: Oklahoma **	August 2022
1	Largest Indian Casino: WinStar World, Chickasaw, Oklahoma	February 2022
3	Classes Applicable to Indian Gaming: I and II and III	March 2023

Note: * Actual Number May Not Reflect New 2023+ Recognitions, Approvals

**Actual Number May Not Reflect Recent 2023+ Openings or Closings,

*** Actual Number May Not Reflect

Created by: Gunter, Noah and Mitchell, Dr. Lloyd

It is essential to look at the number of US federally recognized tribes and how many operate gaming centers as those that have tribal lands on or near airports could argue that as the airport uses tribal land or some of its passengers are here for entertainment within the tribe, could use their tribal sovereignty that allows for Indian gaming to be incorporated onto the airport. This would allow for the tribe to also generate further revenue for the tribe and the airport, pending state improvement. The following three tables detail this further:

Table 4

Tribal Gaming Class Examples as Outlined by National Indian Gaming Commission 2023

Class	Examples
I	Unregulated: Traditional Indian Games and Social Gaming for Minimal Prizes, i.e., Raffle
II	Bingo And Other Games Played Against Other Players and Not the House
III	Slot Machines, Blackjack, Roulette, and Other Gaming Not Covered in Class I Or Class II

Table 5

Tribal Gaming Class Primary Regulations and Regulators as Condensed from the National Indian Gaming Commission 2023

Class	Extent of Compact Regulations
Class I	Fully Vested in Tribal Governments
Class II	Must Be Permitted by State and Approved by Tribe. Primarily Under Tribal Regulation
Class III	Must Be Permitted by State, State Compact Approved by BIA Secretary, And Tribal Gaming Ordinance Approved by National Indian Gaming Commission Chair

Table 6

Tribal Compacts

Number	Description of Tribal Compacts
1067	Total Number Tribal Gaming Compacts Active as of February Reviewed
20	# AZ Tribes Revise Compacts Due To 2021 AZ Gaming Act Online Gaming Approval

Note: Created by: Mitchell, Dr. Lloyd

Tribal compacts are essential to note as these agreements created between an American Indian tribe and the state/states they reside in to regulate gaming operations within American Indian tribal lands. These compacts help to regulate what a tribe can do in terms of gaming and with the possibility of allowing for gaming within airports, tribal gaming compacts should now incorporate the implementation of Indian gaming within airports (U.S. Department of the Interior, 2023). Though these compacts benefit to both American Indian tribes and the state governments that sign them, problems do occur and have shown up recently.

Tribal gaming compacts have become an issue for Oklahoma and a tribe in Northern California. In July 2023, the Attorney General for the state of Oklahoma filed a lawsuit between "the U.S. Department of Interior, four tribal nations and Stitt" (McNutt, 2023). This lawsuit was brought on due to a perceived overstep of power that the governor of Oklahoma made when signing the gaming compact for the four tribes listed in the lawsuit without legislative approval for the expansion of terms in these compacts for gaming. The US Department of Interior is listed as a defendant in the lawsuit due to their approval of the compacts in 2020 (McNutt, 2023). This case will be interesting to note for future research as the case is ongoing. The other example of a

current issue with tribal gaming compact is between the Rincon Band of Luiseño Indians and the state of California (Mapp, 2023). The Rincon Band rescinded their compact in favor of federal supervision as they felt it would allow for more tribal sovereignty and end a history of legal dispute between the tribe and state over regulatory costs (Mapp, 2023). Besides looking at how American Indians have succeeded in gaming operation within their lands and the issues they face in such operations, it is also essential to look at how airports have been operated by tribes on their land as well.

It is essential to look at airports operated by American Indian tribes because of their experience in aviation and airport operations. With such experience, American Indian tribes can work with state and federal aviation entities to incorporate gaming and work to ensure successful airport operations. The table below shows airports operated by American Indian tribes in the US:

Table 7

Wholly Owned American Indian Community Airports

Airport Category	Code	Airport	Tribe
Non-Primary, Commercial Service, Local	CGW	Grand Canyon West	Havasupai
Non-Primary, Commercial Service, Local	ARC	Arctic Village Airport	Venetie
Non-Primary, Local	P20	Avi Suquilla Airport	Colorado River Indian Tribes

Table 7 cont.

Non-Primary, Local	Z95	Cibecue Airport	White Mountain Apache Tribe
Non-Primary, Local	SUO	Rosebud Sioux Tribal Airport	Rosebud Sioux
Non-Primary, Local	E14	Ohkay Owingeh Airport	Ohkay Owingeh
Non-Primary, Local	10U	Owyhee Airport	Shoshone Paiute
Non-Primary, Local	IEN	Pine Ridge Airport	Oglala Sioux
Non-Primary, Commercial Service, Local	VEE	Venetie Airport	Venetie
Non-Primary, Local	E24	Whiteriver Airport	White Mountain Apache

Note: Created by: Gunter, Noah and Mitchell, Dr. Lloyd

It is important to note these types of airports as it shows the expertise and knowledge that American Indian tribes can bring regarding of aviation for gaming within airports. American Indian tribes can work with FAA Part 139 Airports to implement gaming and use their ongoing experience with gaming to ensure gaming success.

Framework for Airport Gaming Operations

When looking at the case studies of gaming operations at Harry Reid International and Reno-Tahoe International Airports, many similar airports in the US can operate gaming just like these airports. By utilizing the ongoing gaming operations, case studies reviewed in this research that are preparing to implement gaming could prepare and have a successful implementation of gaming within their operations. As discussed with previous attempts of gaming implementation, utilizing current gaming operations at airports in the US allows for a framework to be developed at other airports to be used across the US based on the factors that airport has for gaming. The following discusses the factors that help or hinder gaming at airports.

Factors Conducive for Gaming Device Placement Within Airports by American Indian Tribal Communities

1. Airports Located Within Tribally Inclusive Geographic Areas (TIGA)

If an airport is located within a TIGA, a tribal community, or communities, have specific rights, if opted to use or successfully negotiate for, and allow for gaming machine placement in the terminal (National Indian Gaming Commission, 2022). Being within a TIGA is beneficial to an airport as it allows for American Indian tribes to have rights to the airport and its operation. It can also allow for tribes to discuss with the state and federal government to incorporate airport gaming into their tribal compact as the airport would be considered on their land. This is especially seen at Green Bay International because part of the airport's property being on a TIGA.

2. Airports Located Within TIGA With Tribally Operating Casinos

Airports located within TIGA that have a tribe, or tribes, operating a casino, are a major factor conducive to the development and placement of tribal gaming machines within a terminal. This is because a variety of legal recognitions are, or be, already in place to allow for tribally owned gaming machine placement in the TIGA serving airport. This is different than the previous factor because it is important for a tribe, or tribes, to already be operating a casino as they will already have gaming compact between the state or federal government and could incorporate their gaming operations at the airport (U.S. Department of the Interior, 2023).

3. Airport, Airport Approaches, Or Other Operational Support Facilities Such as Stationary Equipment, Are On, Adjacent To, Or Nearby Tribal Community Land

Although this category combines one and two above, it is also specific for placing actual airport or airport operation support related structures on tribal lands or lands adjacent to tribal community owned land. If tribal lands are used in support of airport operations in any capacity, then tribes have a sturdy base to argue, from a legal standpoint, allowing gaming machines at airports. With such activities, tribes can offer an arrangement that includes incorporating gaming into airport operations.

4. Intergovernmental and Intertribal Relationships

With airport gaming involving multiple political entities, an environment with solid and cooperative intergovernmental relationships is conducive to the approval process (National Indian Gaming Commission, 2022). State compacts for Class II Gaming and Federal level approval for Class III Gaming are necessary Because by allowing for these gaming classes

within airport by American Indian tribes (National Indian Gaming Commission, 2022).

Additionally, for intertribal collaborative gaming ventures, good relations between tribes are

essential. Collaboration specific for Intertribal Class II and Class III Gaming at airports will

require a new portion of compacts and extensive negotiation between tribal entities, the state, and

airport authorities because current compacts do not have any agreement or clarification for

gaming at airports and what tribes can do in that regard.

Factors Inhibiting Gaming Device Placement Within Airports by American Indian Tribal

Communities

1. Airports Not Located Within Tribally Inclusive Geographic Areas (TIGA)

Suppose an airport is not located within a TIGA, a tribal community, or communities. In

that case, a tribe may not have specific rights to use or successfully negotiate for, or allow for,

gaming machine placement in the terminal. Land owned in whole or part by members of Indian

tribes or Indian-owned corporations but not deeded to the tribal member's or members' tribe is

considered private citizen property and is not considered TIGA land. If this is the case, then the

state that the airport is not operating in could reject gaming at the airport.

2. Airports Not Located Near Tribes with Tribally Operating Casinos

Airports not located near a tribe or tribes actively involved in gaming operations, is a

significant factor not conducive to developing and placing of tribal gaming machines within a

terminal. This is, partly because the variety of legal recognitions required are not in place to

allow for tribally owned gaming machine placement in an airport terminal.

3. Airport, Airport Approaches, Or Other Operational Support Facilities Such as Stationary Equipment, Are Not On, Adjacent To, or Near Tribal Community Land

If the airport has no operational factors that affect or involve the tribe or tribes, then the tribe would have difficulty in seeking arrangement for gaming at the airport. Furthermore, such exclusions in the planning process could prevent marketing or public information for the tribe or tribes.

4. Poor Intergovernmental or Intertribal Relationships

Due to airport gaming involves multiple political entities, an environment with solid and cooperative intergovernmental relationships is conducive to the approval process. State compacts for Class II Gaming and Federal level approval for Class III Gaming are necessary. Additionally, for intertribal collaborative gaming ventures, good relations between tribes are essential. Collaboration specific for Intertribal Class II and Class III Gaming at airports is going to require a new type of compact never developed and extensive negotiation between tribal entities, the state, and airport authorities. Along with this, a tribe's recognition by the state or federal government is important because if the tribe is not recognized by the federal government, they will need to follow the state's law in terms of gaming.

5. Health and Safety Issues

When considering the implementation of gaming at airports, health and safety is vital to consider public health and safety issues related to airport gaming. The following are factors that need to be considered while implementing gaming to ensure a clean and positive environment:

1. Airline Pilot Actions

This factor is important to highlight as it can lead to a loss of focus and accidents and incidents. Such actions could lead to a lapse in essential steps during a safety or operations checklist, loss of focus and missing things during flight operations, and be unable to cope with losses and become belligerent towards passengers and crew members. Furthermore, such factors could lead to a decrease in performance or even cause flight delays or cancellations (Weeks, 2023). From *Aviation and Public Health: An Interdisciplinary Research Project Combining Aviation Health and Safety Related to Gambling at Airports and American Indian Tribes*, it can be ascertained that the following could happen from these actions:

A. A pilot acts out in anger after losing substantial amounts of money and decides to intentionally harm the plane or the passengers on board.

B. A pilot loses focus on flying over being addicted to gaming.

C. A pilot who gambles regularly acts out in risky behavior not suitable for operating an aircraft.

2. Air Traffic Control (ATC) Personnel Actions

Like issues that pilots could face by, ATC personnel become distracted by wins or losses and can impede performance, creating a significant risk for accidents and incidents to occur.

3. Airline Flight Crew Member Actions

By becoming accustomed or distracted by gaming at the airport, flight crew members only focus on gaming and lose focus on their duties and services. This is important because crew members provide drinks, snacks, and other services to passengers and security and emergency assistance to ensure passengers are happy and safe during their travel to the destination. Such distractions can cause irate customers and even security lapses that could lead to a takeover of

the aircraft. *Aviation and Public Health: An Interdisciplinary Research Project Combining Aviation Health and Safety Related to Gambling at Airports and American Indian Tribes* also details the actions from this factor as:

A. Flight crew becomes accustomed to starting the day off gaming and can distract them from their duties

B. Flight crew does not show up to their proper locations due to being stuck gaming.

C. Flight crew must spend unnecessary time before and during the flight dealing with passengers being more agitated due to gaming losses.

4.Actions by Aircraft Operations Support Personnel (Mechanics et al.)

Airport and Airline Personnel responsible for supporting airport operations engage in irresponsible behavior or make critical errors if upset by recent airport gaming losses. From these distractions and loss of focus, mistakes can be made in the form of lost luggage, incomplete or incorrect maintenance, and misfuelling incidents. These lapses in responsibilities can lead to a variety of effects from lost luggage and irate passengers to the loss of an aircraft due to fatigue to the aircraft from improper maintenance or misfuelling.

5. Actions by Passengers

Actions by passengers are the largest factor, along with disease transmission for health and safety issues (Weeks, 2023). These machines will be primarily marketed towards passengers and will be the most substantial number of users, which could lead to multiple instances of subfactors listed above. Events such as forgetting items in the gaming area, missing flights due to not hearing announcements, and becoming irate due to losing money could cause security and operational issues to address for gaming operations (Weeks, 2023). The effects of this could be:

A. Passengers who lose money on a slot machine take their anger out on fellow passengers

B. Passengers who lose money on a slot machine take their anger out on flight crew

C. Passengers who have connecting flights through airports with gaming do not want to be exposed to gaming due to previous gaming addiction or religious beliefs.

D. Passengers attack slot machines after losing, disrupting at the gate areas, resulting in flight delays.

E. Passengers miss flights due to wanting to continue gaming

F. Many people traveling with their children want to gamble and will leave their children unattended due to no one under 21 in the slot machine area. This risks child abduction.

G. Arriving passengers to gamble initiate gaming as soon as deplaning and can be upset if they lose copious amounts of money.

H. Arriving passengers who have been drinking are more eager to gamble and unintentionally lose more money

I. Arriving passengers who have been drinking are more likely to act out violently after losing money

J. Arriving passengers forget to pick up their pets when arriving due to instant distractions caused by gaming

K. Arriving passengers forget to pick up their luggage when arriving due to instant distractions caused by gaming

6. Communicable Disease Transmission

Disease transmission is a health and safety issue for airports because the transmission of bacteria, viruses, and parasites can take place between slot machines and the gamer. As people

excessively touch the machine surfaces, a disease outbreak could occur at the airport (Weeks, 2023). Then these could spread to not only the surrounding area but also worldwide as passengers exposed to such microbes could spread illnesses to the area they are going to and those in airports that they are connecting flights in (Weeks, 2023).

When considering public health safety for gaming at airports, it is essential to implement actions to mitigate or eliminate these factors. The factors listed in implementing gaming at FAA Part 139 Airports show that both FAA Part 139 Airports and American Indian Tribes can benefit from incorporating gaming at airports together. Utilizing the expertise and success that American Indian tribes have had in gaming through the vast numbers of gaming on tribal lands that are operated and the vast number of passengers that FAA Part 139 Airports bring in, gaming be another source of revenue to benefit the airport, American Indian tribe/s, communities involved, and passengers that can win. Creating feasibility studies like the one provided to the city of Chicago for its gaming implementation would help airports indicate what would be the best number, placement, and type of machine. When viewing these factors and the data collected for this research, FAA Part 139 airports can be able to incorporate these operations while helping local and marginalized communities by partnering with American Indian tribes for the implementation of gaming.

CHAPTER IV

DISCUSSION

The findings of this research show that airports and American Indian tribes can benefit from a partnership that incorporates gaming into airport operations. By looking at the data review of airports that have found success and are in the process of incorporating gaming into their airport operation, it can be shown that there is a market and potential for gaming within airport operations. Even though two of the case studies given highlight failures of incorporating gaming within airport operations, it shows the interest of such gaming in the area and the possibility of gaming being incorporated into those areas in the future. American Indian gaming and airport data was collected to show not only their expertise in the gaming and aviation industry but also to highlight their ability to begin operations if a partnership was formed. American Indians have classes of gaming and a multitude of gaming operations that can be incorporated into airport operations. With the multitude of gaming operations and examples listed in Tables 4-6, American Indian tribes have shown that they have the current operations and capacity to incorporate gaming within airports that would be willing to partner to do so. Furthermore, looking at tribal compacts helped show the current agreement between American Indian tribes and both state and federal governments to ensure compliance in these gaming operations. The incorporation of airport data into the research helps show that tribes do have experience with commercial airport operations and can begin a dialogue with airport officials for an easier incorporation. Finally, by listing all the factors that can benefit or hinder the

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implementation of gaming at airports can help to mitigate the hinderances and use the conducive factors to help have a successful implementation of gaming. Though this research attempted to be comprehensive, it could not be due to a variety of factors and as such, recommends further research on the topic in the future.

Future Research

If airports begin implementing gaming within their operations, the challenges they faced at the state level and how they overcame those challenges will be important for other airports. By overcoming these challenges, other airports looking at implementing gaming within their operations could use the previous successful frameworks for their own, as seen in Illinois. Considerations such as how the airport and American Indian tribe/s worked together to allow for legislation to pass or allow for approval for gaming operations will be important to note for future implementation, necessitating future research. Furthermore, it is also important to note how tribal compacts will be revised to incorporate airport gaming operations as it will allow the tribe/s to have an agreement with the state to operate and be approved for gaming implementation at airports.

Another topic of future research is the number of partners that can work to implement gaming at airports. In that case, the debate on whether only one or a consortium of tribes can operate the gaming operations should be looked at. Many airports operate on tribal lands and Table 8 shows examples of airports that are within TIGAs:

Table 8

Part 139 Airports within TIGAs

Single or Multiple TIGAs	Airport	American Indian Tribe(s)
Multiple	Spokane	Spokane, Colville, Cor d'Alene
Multiple	Phoenix	Gila River, Fort McDowell, Yavapai, Tohono O'odham, San Carlos Apache, White Mountain Apache
Single	Green Bay	Oneida
Single	Milwaukee	Potawatomi

Note: Created by: Gunter, Noah and Mitchell, Dr. Lloyd

This is not a comprehensive list as these are the only FAA Part 139 Airports that were observed

Tribes can argue that since the airport is within their TIGA, they have a right to operate gaming within the airport, per each agreement of their tribal compact (Tribal Alliance of Sovereign Indian Nations, 2023). Each compact is different between each tribe, state, or the federal government and such research can be made to see how tribes could work to incorporate airport gaming into their compacts. Furthermore, the mediation and events to follow such discussions will be noteworthy research to follow if gaming would be implemented as such. Another aspect of follow-up research would be the effectiveness of a single tribe or consortium of tribes operating within gaming at airports. To see if a singular tribal operation can be more effective than a consortium as there would be less infighting and disputes would be a focus of

research to follow as gaming is implemented at airports. With these research points, further research should follow this project and gauge the success of implementing gaming at airports.

Limitation of Study

The crucial limiting factors of this research was the limited amount of prior research and the recent developments of gaming at airports and American Indian trial involvement. When looking for research, research on a possible partnership between American Indian tribes and FAA Part 139 Airports were limited in terms of a framework for implementation. This limited availability of research caused a need to collect data and sources through other means. Only with media and organizational releases on gaming at airports and American Indian Gaming could data be collected and connected can work based on how it operates within FAA Part 139 airports, data was collected, and connections were made to see how they operate. Furthermore, travel that happened to coincide with this research allowed for observation of gaming at airports, how American Indian tribes operate their gaming, and how it can be incorporated at airports. Another factor that limited this research was the recent developments that were used in the case studies. Outside of gaming at airports within the state of Nevada, there has been little to no effort of incorporating gaming at airports until 2016 and success of allowing gaming at airports in 2017. The time for such implementation has been delayed and has been limited in checking their progress and start date. With having Pennsylvania acquiring gaming regulations for airports in 2019, Illinois allowing for gaming in 2019, and world events such as the COVID-19 Pandemic to delay such implementation, plans for gaming have been delayed by years and as such, could not be researched. This was why it was noted in the future research section that this and other factors of gaming at airports to be researched in the future.

Conclusion

This project looked at FAA Part 139 airports that have made attempts or are in the process of implementing gaming with airport terminals and gaming within American Indian tribes recognized by the US. By looking at these case studies through a qualitative lens, it can be determined that FAA Part 139 airports and American Indian tribes would benefit by developing a relationship allowing for gaming to be implemented at these airports. When looking at the data gathered for this research, gaming at FAA Part 139 Airports can be successful and beneficial, in terms of financial compensation, for all involved to form a relationship between the airport and American Indian tribes. This relationship can be beneficial from the money being generated to go to both airport operations and the tribes that operate the machines. Though there are several challenges to face in the form of legislation, public acceptance, cost of implementation, and interest from the gaming community, this research showed that these can be addressed and overcome to allow for gaming to be implemented. Furthermore, gaming within airports would be beneficial for all involved with the revenue generated to go to the airport, American Indian tribe, and the community around the airport. With American Indian tribes using their expertise in gaming and working with state and federal governments in gaming regulations and tribal compacts, a successful implementation of gaming at airports can be made. It is further recommended that future studies be conducted on the matter, and many of the planned gaming implementations are delayed or cancelled. In doing so, this research allows for another revenue stream for airports and American Indian tribes that are able and willing to participate in such partnerships.

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APPENDICES

Appendix A
Site Visit One: American Indian Science and Engineering Society (AISES)
Conference Attendance, Palm Springs, California

During the 2022 Autumn semester, I attended the American Indian Science and Engineering

Society annual conference in Palm Springs CA. During this conference I learned about tribal

sovereignty, US tribal political relationships, American Indian culture, and the critical impact of

Indian gaming in the United States. Based upon information derived from conversations and

presentations at this conference the potential for American Indian tribes to host, cohost, or

manage gaming at airports was incorporated as part of a larger project related to airport public

health and safety.

Appendix B
Site Visit Two: LAS Airport

Two site visits were made at the LAS Airport. During these visits, I became familiar with the

strategic placement of the slot machines near the seating area of the gates. These machines were

unavoidable in the LAS Airport. I also took note of strategically placed ATMs near the machines

to allow for the continuing of gaming.

Appendix C

Site Visit Three: GRB Airport

In August 2021, The Green Bay International Airport was visited to view the airport and discuss

its gaming operation with the assistant airport director at the time. Though before the

introduction of gaming machines at the start of 2022, it was determined that gaming machines

would benefit the airport as it can introduce passengers to gaming that is offered across the street

at gaming location run by the local Oneida tribe. As noted before, the airport is partially located

on Oneida tribal land, and this is what allowed for a gaming machine to be incorporated within

the terminal post security and in the arcade area of the airport. This allows travelling locals and

passengers with a long layover to experience gaming and see some of the gaming offered across

the street from the airport. This airport can be used as an example for others in working with

American Indian tribes

Appendix D

Site Visit Four: DEN Airport

In June 2022, Denver International Airport was visited and observed. Denver would be an airport to incorporate gaming due to its layout and development. Denver has three central areas for each of their terminals where gaming areas can be developed along with the ends of each terminal. Furthermore, with the airport being the largest in land size in the US, tribes can work to develop gaming locations on airport property such as casinos. This will be important as Denver expands towards the airport.

Appendix E

Site Visit Five: ATL Airport

Over the last three years, Atlanta International Airport has been visited many times in between travels. While doing so, the entire airport was viewed and would be a very place to incorporate gaming as not only is the airport the busiest in the world but also the terminals have ample space to accommodate gaming areas to operate. These gaming locations tie into the American Indian display detailing the local tribes as you walk between concourses. Just as some international airports worldwide have casinos within their terminals, Atlanta offers multiple gaming locations for their international passengers.

Appendix F

Site Visit Six: DTW Airport

Like Atlanta, Detroit International Airport has been visited many times in between travels over

the last three years. This location incorporates gaming due to its central connection between the

two terminals and multiple areas where gaming locations can be placed. Furthermore, just as the

Westin Hotel connects directly to the airport, American Indian tribes include a casino to those as

they wait for their flights. Though it would be limited to its size, it would be like Reno's

operation.

Appendix G

Site Visit Seven: MCO Airport

Orlando International Airport was visited in Summer 2021. Gaming can be implemented there by the Seminole Tribe as the airport has different terminals where gaming locations can be placed in. Just as with Detroit, Orlando has a hotel within the airport and incorporates gaming centers there or even builds a casino there. With the number of passengers increasing, Orlando would serve as a great spot and represent casinos in Florida such as the Hard Rock Casino. Disney can also assist in this as they have an amusement park near the airport.

Appendix H

Site Visit Eight: SEA Airport

Seattle-Tacoma International Airport (SEA-TAC) has been visited several times over the past three years. With many tribes in the local area offering gaming within their reservations, tribes would want to incorporate gaming at SEA-TAC as well. SEA-TAC offers several areas that would serve as locations for gaming in each terminal and even offer expansions soon. This can also be possible as Washington has a good relationship with American Indian tribes within the state and serves millions of people in the area. It would be the only major airport in the area and would be easy to serve the local and international passengers as they pass through.

Appendix I

Site Visit Nine: PHX Airport

Phoenix International Airport was visited in Summer 2022 for a conference, but the airport was also observed. Phoenix International would serve as a place to implement gaming as gaming areas can be placed both before and after security for passengers and locals. This would help bring in a continuous revenue stream for the airport and a tribe or tribes operating the machine. The sky train allows for easy access to the airport and makes it easier for passengers to spend time doing other things that include gaming. Furthermore, with local tribes and significant sporting events in the immediate area, these gaming areas become popular with sporting events nearby and are further funded by these sporting teams.