

Response to Comments received during the SRR Comment Period on the

Proposed Change to the NMLS Money Services Businesses Call Report July 22, 2020 – August 12, 2020

August 24, 2020

On July 22, 2020, the State Regulatory Registry, LLC (SRR)¹ invited public comments on the proposed changes to the NMLS² Money Services Business Call Report (MSBCR). After the MSBCR Subcommittee³ reviewed the comments, SRR summarized the responses in the following document. With the feedback received, the MSBCR Subcommittee and SRR intend to publish a final specification of the MSBCR revisions that will be implemented.

Goal of the NMLS Money Services Businesses Call Report

The Money Services Businesses (MSB) Call Report (MSBCR) was developed with the goal of enhancing and standardizing the information available to state regulators concerning the activities of their Money Services Businesses licensees (money transmitters, check cashers, prepaid, etc.). The report includes national and state specific MSB activity information that is submitted on a quarterly and annual basis.

Background

A typo was identified in the current definition of MSB Call Report Line Item FC650. The following change was proposed to the MSB Call Report and comments were collected from July 22, 2020 to August 12, 2020:

Line Item	Current Definition	Proposed Revision
FC650: Other comprehensive income/currency translation adjustments.	Include net realized holding gains (losses) on available for sale securities, accumulated net gains (losses) on cash flow hedges, foreign currency translation adjustments, and pension and other postretirement plan related changes, other than net periodic benefit cost. Currency translation adjustment includes revenue earnings, or loss incurred, at the end of the reporting period when translating foreign currency accounts to U.S. Dollars, as further defined under FASB 52 – Foreign Currency Translation.	Include net realized unrealized holding gains (losses) on available for sale securities, accumulated net gains (losses) on cash flow hedges, foreign currency translation adjustments, and pension and other post-retirement plan related changes, other than net periodic benefit cost. Currency translation adjustment includes revenue earnings, or loss incurred, at the end of the reporting period when translating foreign currency accounts to U.S. Dollars, as further defined under FASB 52 – Foreign Currency Translation.

¹ Information about the State Regulatory Registry LLC can be found at http://www.csbs.org/srr/Pages/default.aspx

² Information about NMLS can be found at http://mortgage.nationwidelicensingsystem.org/Pages/default.aspx

³ See Addendum A.

Responses to Comments

At the end of the public comment period, SRR had received feedback from one commenter. The commenter is an industry representative. The MSBCR Subcommittee reviewed the comment.

The commenter supported this change to the definition of MSB Call Report Line Item FC650 to revise a typo.

SRR Response

SRR and the MSBCR Subcommittee support the correction of the typo.

Addendum A

NMLS MSBCR Subcommittee

REPRESENTATIVE	AGENCY
Mr. Bob Venchiarutti	California Department of Business Oversight
Ms. Brandi Eble	Kansas Office of the State Bank Commissioner
Mr. Jason Gworek	Connecticut Department of Banking
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