

Request for Public Comments

NMLS – Money Services Businesses Call Report

October 5, 2015

On behalf of the state regulatory agencies participating in NMLS,¹ the State Regulatory Registry LLC² (SRR) invites public comments on the proposed implementation of the NMLS Money Services Businesses (MSB) Call Report. The NMLS MSB Call Report is intended to fulfill state money services businesses reporting requirements, as well as build on state regulator efforts to create uniform financial and activity reporting requirements across state lines.

The proposed NMLS MSB Call Report is comprised of three parts: financial information about the licensee, information about the licensee's transactional activity, and high-level permissible investment information. The development of the NMLS MSB Call Report draws from various reports required of states and seeks to replace and standardize individual financial and activity reports currently required by state regulators.

Purpose of the NMLS Money Services Businesses Call Report

The purpose of the NMLS MSB Call Report is to provide timely, comprehensive, and uniform information and reporting frequencies concerning the financial condition, transactional activities, and high-level compliance with state permissible investment requirements on entities licensed in money services businesses. The objectives of the NMLS MSB Call Report are as follows:

- 1. Provide state regulators with the information necessary to replace the unique reports currently required by approximately 36 states and to standardize reporting of financial condition information.
- 2. Provide state regulators with sufficient information to effectively supervise licensees, such as determining examination schedules, risk assessment analyses, monitoring compliance with state law and permissible investment requirements, and accurately calculate assessments, where applicable.
- 3. Provide state regulators with the ability to develop detailed transactional activity reports with the ability to compare across state lines.
- 4. Provide licensees with the ability to automate the provision and retention of financial condition, transactional data, and permissible investment amounts to one or more state regulators in a single, uniform manner.

² Information about the State Regulatory Registry LLC can be found at <u>http://www.csbs.org/srr/Pages/default.aspx</u>

¹ Information about NMLS can be found at <u>http://mortgage.nationwidelicensingsystem.org/Pages/default.aspx</u>

5. Provide licensees with standard reporting frequencies for ongoing financial condition, transactional activity, and permissible investment reporting requirements.

Background

State Regulatory MSB Reporting

Approximately 36 states require licensed money services businesses companies to submit quarterly or annual reports providing transactional activity and permissible investment amounts, often including information on in-state, foreign, and domestic transactions, permissible investment ratings, agent transaction detail and volume and dollar amount of transactions completed. These reports are utilized by state regulators for a variety of reasons, including calculating assessments, risk assessment, scheduling exams, determining legislative compliance, and generating reports on transactional activity within a state and at the national level.

In addition to the reporting requirements detailed above, the majority of state money services businesses regulators require financial statements and/or financial condition information to be provided on an ongoing basis. NMLS currently has functionality that permits licensees to file a single financial statement with one or more regulators through the system. This functionality does not standardize financial statement reporting requirements across states or facilitate the utilization of financial information for the purposes listed above.

The NMLS MSB Call Report applies to licensees who conduct the following activities: money transmission, check cashing, issuing or selling travelers checks, issuing or selling drafts, foreign currency dealing and exchange, issuing or selling money orders, bill paying, issuing or selling prepaid access/stored value products, and virtual currency.

NMLS Money Services Businesses Call Report Working Group

A working group of state regulators commenced in February 2015 to develop the proposed NMLS MSB Call Report and accompanying definitions and policies. These definitions, policies, and a discussion draft of the proposed NMLS MSB Call Report are the subject of this Request for Comments.

The NMLS MSB Call Report Working Group will review the public comments received and elicit state regulator input before presenting a recommendation to the NMLS Policy Committee. The roster of the NMLS MSB Call Report Working Group can be found in *Addendum A* of this Request for Comments.

NMLS Money Services Businesses Call Report

The NMLS MSB Call Report is proposed to be a quarterly condition report submitted through NMLS by an entity with at least one money services business license. These quarterly reports are comprised of three parts:

- Part I: Financial Condition Report for the company
- Part II: Transactional Activity Report
 - a. Company-wide Transaction Detail
 - **b.** State Transaction Detail
 - c. Company Owned Location and Agent Transaction Detail (If Required by State)
- Part III: Permissible Investment Report, at company level

The discussion draft of the proposed NMLS MSB Call Report with these three parts is attached to this Request for Comments.

NMLS Money Services Businesses Call Report Policies

It is proposed to implement the NMLS MSB Call Report according to the following policies:

- The NMLS MSB Call Report is a uniform form that will be completed by MSB companies, licensed in states that choose to require their licensees to submit the report. Companies will only be required to complete sections and questions that are relevant to the company's MSB activities and/or authorities. Those areas of the form that are not applicable to a specific company would not be required, by the system, to be completed.
- 2. The financial information provided in the Financial Condition Section (Part I) of the NMLS MSB Call Report should be reflective of the licensee's activities and is only required to be completed once per licensee per calendar quarter. Consolidated financial information (that contains parent company financial information) will not be accepted for the NMLS MSB Call Report. Financial information should be reported on a quarterly basis and only include financial data for the quarter being reported.
- 3. In adopting states, companies that, under state laws or regulations, are required to submit a self-prepared financial statement as part of maintaining a license or registration may use the NMLS MSB Call Report to meet this requirement. Companies that are required to submit a Compiled, Reviewed or Audited financial statement must complete and submit such financial statements through NMLS in addition to the NMLS MSB Call Report.
- 4. The filing of the NMLS MSB Call Report through NMLS to relevant state regulator(s) will be executed by the company. A company holding more than one license type in a jurisdiction is only required to submit one NMLS MSB Call Report for that jurisdiction. A company licensed in multiple states will complete a separate Uniform State Level Transaction Activity Report (Part II(b)) for each state in which they are licensed and has adopted the NMLS

MSB Call Report. The Company Level Transaction Activity Report (Part II(a)) is only required to be submitted once per quarter even if the entity is licensed in multiple states.

- 5. Companies are only required to complete sections relevant to their activities in the Transactional Activity Reporting Section (Part II). For example, if a company only conducts check cashing activity, the system only requires the license to complete the check cashing transactional activity data fields. Activity is to be reported on a year-to-date (YTD) basis.
- 6. For company owned location and agent transaction reporting (Part II(c)), only companies licensed in states that require company owned location and agent transaction reporting would need to submit this data for company owned locations and agents relevant to that state.
- 7. The Permissible Investments Report (Part III) of the NMLS MSB Call Report is only required to be completed once per licensee per quarter and should reflect permissible investment amounts at the company level.
- 8. Companies with one or more licenses in any "approved" status during the quarter will be required to file the NMLS MSB Call Report on a quarterly basis in states that adopt the Report. The collection of the NMLS MSB Call Report will replace certain existing reporting requirements in states that adopt the Report.
- 9. Failure to submit the report within 45 days of the end of the calendar quarter results in the creation of a license item placed on relevant licenses held by a company and may result in a state regulatory action. Such license items may prevent the renewal of the impacted license(s).
- 10. All company filings are confidential, but will be available to all state regulators under the System's information sharing architecture.
- 11. State, regional, and national aggregated data that does not disclose any particular company's information may be made available by SRR or state regulators.

Request for Public Comments

The State Regulatory Registry LLC (SRR) is seeking comments from the public on the proposed NMLS MSB Call Report policies, definitions, and draft detailed in this document. SRR seeks input on the following specific areas:

- 1. Will the proposed NMLS MSB Call Report provide sufficient information to state money services businesses regulators regarding the transaction activity of the various money services businesses activity types in order to eliminate unique state reports and improve supervision? If not, what additional information should be requested?
- 2. Certain states require the transmission activity to include destination country information. Would it be convenient/beneficial for industry if the NMLS MSB Call Report

included functionality for states that require their licensees to report destination country to receive it through the NMLS MSB Call Report? This would most likely be accomplished through the submission of additional data elements in the state specific transactional activity section of the report.

- 3. Does the proposed NMLS MSB Call Report provide sufficient information to state money services businesses regulators regarding high-level permissible investment amounts (if applicable to licensee's activity type(s))? If not, what additional information should be requested?
- 4. How do licensees currently handle their permissible investment allocations based upon varying state requirements? For example, do licensees ensure that all their permissible investments adhere to the strictest state's permissible investment requirements that they are obligated to follow?
- 5. In order to improve regulatory supervision, the NMLS MSB Call Report is intended to be collected on a quarterly basis. SRR invites comments on the frequency of data collection that best meets the goals of state money services business regulators.
- 6. SRR recognizes that multiple technological methods (from manual data input to automated data upload) exist that would enable companies to supply this information through NMLS. We invite specific comments if your company has an opinion on the manner in which this information is entered in the System.

Comments are requested to be limited to the content of this document as it relates to NMLS MSB Call Report.

Comments received, as well as the submitter's name and company or organization (if applicable) will be posted on the NMLS Resource Center for public view.

All NMLS MSB Call Report comments will be reviewed by the NMLS MSB Call Report Working Group comprised of state regulators and will be reviewed with all state regulators. The recommendations for proposed changes from the working group will be sent to the NMLS Policy Committee (NMLSPC) for evaluation and approval or rejection. Responses to comments and the final approved NMLS MSB Call Report will be posted on the NMLS Resource Center.

The NMLS MSB Call Report is not expected to be a requirement in NMLS for licensees in states adopting the report until 2017.

Persons submitting comments are encouraged to provide these comments electronically via email to: <u>comments@csbs.org</u>

Comments may also be submitted in physical form to:

State Regulatory Registry Conference of State Bank Supervisors Attn: Tim Doyle, Senior Vice President 1129 20th St NW, 9th Floor Washington, DC 20036

Comment submission deadline: December 5, 2015

SRR will provide 60 days for public comments on the Money Services Businesses Call Report Forms.

SRR will host a conference call to address any preliminary questions from interested parties. Additional information regarding this conference call will be posted on the NMLS Resource Center and will be sent to entities holding a MSB license in NMLS.

ADDENDUM A

NMLS MSB Call Report Working Group

Adam Johnson MSB Financial Examiner Supervisor Washington Department of Financial Institutions

Dawn Woolery Consumer Services Supervisor Washington Department of Financial Institutions

Nick Nepveu Licensing Examiner Massachusetts Division of Banks

Tim Knopp Director, Bureau of Non-Depository Examinations Pennsylvania Department of Banking and Securities **Branton Grimes** Financial Examiner North Carolina Office of the Commissioner of Banks

Grissel Molina Financial Examiner Texas Department of Banking

Sue Clark Regulatory and Consumer Affairs Director Vermont Department of Financial Regulation

PART I: FINANCIAL CONDITION REPORT

ASSETS		
FC1	Cash on Hand and in Bank	
FC2	Due from agents (net of allowance for doubtful accounts)	
FC3	Amount of allowance for doubtful accounts	
FC4	Accounts receivable (net of allowance for doubtful accounts)	
FC5	amount of allowance for doubtful accounts	
FC6	Inter-company receivables	
FC7	Notes/other receivables	
FC8	Investments (including government securities)	
FC9	Virtual currency (in U.S. dollars)	
FC10	Other current assets (Detail in section TBD if amount exceeds 20% of total)	
FC11	Total current assets	Auto-populated
FC12	Premises, furniture, fixtures and equipment (net of accumulated depreciation)	
FC13	Investments in subsidiaries not consolidated	
FC14	Goodwill and other intangibles	
FC15	Other assets (Detail in section TBD if amount exceeds 20% of total)	
FC16	TOTAL ASSETS	Auto-populated

³ All fields shaded in orange are automatically populated by the system based on the company's entries. To view the specific fields utilized to auto-populate, please view the MSB Call Report Glossary.

LIABILITIE	S AND EQUITY	
FC17	Accounts payable	
FC18	Inter-company payables	
FC19	Notes/other payables	
FC20	Outstanding money received for transmission liability	
FC21	Outstanding payment instruments	
FC22	Outstanding stored value	
FC23	Outstanding virtual currency liability (in U.S. dollars)	
FC24	Other current liabilities (i.e., Accrued expenses, income tax payable, current portion	
FC24	of long term debt, etc.)	
FC25	Total Current Liabilities	Auto-populated
FC26	Long term notes payable	
FC27	Other Liabilities (Detail in section TBD if amount exceeds 20% of total)	
FC28	TOTAL LIABILITIES	Auto-populated
	SHAREHOLDER'S EQUITY	
FC29	Preferred stock	
FC30	number of shares outstanding (as actual number)	
FC31	Common stock	
FC32	Number shares authorized (use actual number)	
FC33	Number of shares outstanding (use actual number)	
FC34	Paid-in-capital in excess of par	
FC35	Total Contributed Capital	Auto-populated
FC36	Retained earnings	
FC37	Other comprehensive income	
FC38	Shareholder distribution	
FC39	TOTAL SHAREHOLDERS' EQUITY	Auto-populated
FC40	TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	Auto-populated

INCOME STATEMENT		
	REVENUES	
FC41	Fee income from money received for transmission	
FC42	Fee income from sale issuance of payments instruments	
FC43	Fee income from sale issuance of stored value	
FC44	Fee income from check cashing services	
FC45	Fee income from currency exchange services	
FC46	Interest and dividends	
FC47	Foreign exchange gains or losses	
FC48	Other income (Detail in section TBD if amount exceeds 20% of total)	
FC49	TOTAL REVENUE	Auto-populated
	EXPENSES	
FC50	Salaries and employee benefits	
FC51	Agent fees	
FC52	Rent	
FC53	Interest expense	
FC54	Depreciation and amortization	
FC55	Communication expense	
FC56	Professional services expense	
FC57	Marketing and promotion	
FC58	Insurance expense	
FC59	Taxes and licenses	
FC60	Other expenses (Detail in section TBD if amount exceeds 20% of total)	
FC61	TOTAL EXPENSES	Auto-populated
FC62	Income from Continuing Operations before Income Tax	Auto-populated
FC63	Income tax	
FC64	Income from continuing operations	Auto-populated
FC65	Discontinued operations, Net of tax effect	
FC66	Other comprehensive income/currency translation adjustments	
FC67	Income before extraordinary items	Auto-populated
FC68	Extraordinary items, net of tax effect	
FC69	Net Income (loss)	Auto-populated

PART II(a): TRANSACTIONAL ACTIVITY REPORT COMPANY-WIDE TRANSACTION DETAIL

TRANSAC	TION ACTIVITY AT COMPANY LEVEL (BY LICENSE TYPE)	
MONEY T	RANSMISSION (INCLUDES BILL PAY AND BUSINESS TO BUSINESS)	
TA 1	# of bill pay transactions	
TA 2	\$ amounts received for bill pay transactions	
TA 3	# of business to business transactions	
TA 4	\$ amounts received for business to business transactions	
TA 5	Total # of all other consumer transactions from U.S. states and territories to foreign countries	
TA 6	Total \$ amount received for all other consumer transmission from U.S. states and territories to foreign countries	
TA 7	Total # of all other consumer transactions from U.S. states and territories to U.S. states and territories	
	Total \$ amount received for all other consumer transmission from U.S. states and territories to U.S. states and	
TA 8	territories	
TA 9	TOTAL # of All Other Consumer Transmission Transactions	Auto-populated
TA 10	TOTAL \$ Amount of All Other Consumer Transmission Transactions	Auto-populated
TA 11	TOTAL # of All Money Transmission Transactions	Auto-populated
TA 12	TOTAL \$ Amount of All Money Transmission Transactions	Auto-populated
PAYMEN	T INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)	
TA 13	Total # of payment instruments issued/sold	
TA 14	Total \$ amount of payment instruments issued/sold	
STORED V	/ALUE	
TA 15	Total # of stored value issued/sold	
TA 16	Total \$ amount of stored values issued/sold	
CHECK CA	ISHING	
TA 17	# of checks cashed	
TA 18	\$ amount of checks cashed	
TA 19	\$ amount of fees collected	
TA 20	maximum percentage charged for check	
FIAT CUR	RENCY EXCHANGE	<u> </u>
TA 21	# of currency exchange transactions completed	
TA 22	\$ amount of currency exchange transactions completed	
TA 23	\$ amount of fees collected	
VIRTUAL	CURRENCY	•
TA 24	Total # of Virtual Currency to Virtual Currency Transactions	
TA 25	Total \$ amount of Virtual Currency to Virtual Currency Transactions	
TA 26	Total # of Virtual Currency to U.S. Dollar Transactions	
TA 27	Total \$ amount of Virtual Currency to U.S. Dollar Transactions	
TA 28	Total # of U.S. Dollar to Virtual Currency Transactions	
TA 29	Total \$ amount of U.S. Dollar to Virtual Currency Transactions	
TA 30	TOTAL # of Virtual Currency Transactions	Auto-populated
TA 31	TOTAL \$ Amount of Virtual Currency Transactions (in U.S. Dollars)	Auto-populated

PART II(b): TRANSACTIONAL ACTIVITY REPORT STATE TRANSACTION DETAIL⁴

⁴State level transaction information only required to be completed in states that utilize the report that the company is licensed in. Activity types that are not conducted by the licensee are not required, by the system, to be completed.

TRANSAC	TION ACTIVITY BY STATE (BY LICENSE TYPE)	
MONEY T	RANSMISSION (INCLUDES BILL PAY AND BUSINESS TO BUSINESS)	
ST 1	# of bill pay transactions initiated in-state	
ST 2	\$ amounts received for bill pay initiated in-state	
ST 3	# of business to business transactions initiated in-state	
ST 4	\$ amounts received for business to business transactions initiated in-state	
ST 5	# of all other consumer transmission transactions from in-state to Foreign Countries	
ST 6	\$ amounts received for all other consumer transmission (outbound) from in-state to Foreign Countries	
ST 7	# of all other consumer transmission transactions from in-state to U.S. states and territories	
ST 8	\$ amounts received for all other consumer transmission (outbound) from in-state to U.S. states and territories	
ST 9	TOTAL # of All Other Consumer Transmission Transactions initiated in-state	Auto-populated
ST 10	TOTAL \$ Amount of All Other Consumer Transmission Transactions initiated in-state	Auto-populated
ST 11	TOTAL # of All Money Transmission Transactions initiated in-state	Auto-populated
ST 12	TOTAL \$ Amount of All Money Transmission Transactions initiated in-state	Auto-populated
PAYMEN	T INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)	
ST 13	# of payment instruments issued/sold in-state	
ST 14	\$ amounts of payment instruments issued/sold in-state	
STORED \	ALUE	
ST 15	# of stored value issued/sold in-state	
ST 16	\$ amount of stored values issued/sold in-state	
CHECK CA	SHING	1
ST 17	# of checks cashed in-state	
ST 18	\$ amount of checks cashed in-state	
ST 19	\$ amount of fees collected in-state	
ST 20	maximum percentage charged for check in-state	
	RENCY EXCHANGE	-1
ST 21	# of currency transactions completed in-state	
ST 22	\$ amount of currency transactions completed in-state	
ST 23	\$ amount of fees collected in-state	
VIRTUAL	CURRENCY	-
ST 24	# of Virtual Currency to Virtual Currency Transactions Initiated In-State	_
ST 25	\$ amount of Virtual Currency to Virtual Currency Transactions Initiated In-State	
ST 26	# of Virtual Currency to U.S. Dollar Transactions Initiated In-State	
ST 27	\$ amount of Virtual Currency to U.S. Dollar Transactions Initiated In-State	
ST 28	# of U.S. Dollar to Virtual Currency Transactions Initiated In-State	
ST 29	\$ amount of U.S. Dollar to Virtual Currency Transactions Initiated In-State	
ST 30	TOTAL # of Virtual Currency Transactions Initiated In-State	Auto-populated
ST 31	TOTAL \$ Amount of Virtual Currency Transactions Initiated In-State	Auto-populated

PART II(c): TRANSACTIONAL ACTIVITY REPORT COMPANY OWNED LOCATION AND AGENT TRANSACTION DETAIL⁵

⁵Only required to be reported for states that have agent level transaction reporting requirements. Data fields to be completed for each company owned and/or agent location.

TRANSAC	TRANSACTIONS BY COMPANY OWNED LOCATION AND AGENT (ONLY IF STATE REQUIRES)		
MONEY T	RANSMISSION (INCLUDING BILL PAY AND BUSINESS TO BUSINESS)		
ST 32	# of bill pay transactions initiated in-state		
ST 33	\$ amounts received for bill pay initiated in-state		
ST 34	# of business to business transactions initiated in-state		
ST 35	\$ amounts received for business to business transactions initiated in-state		
ST 36	# of all other consumer transmission transactions from in-state to Foreign Countries		
ST 37	\$ amounts received for all other consumer transmission (outbound) from in-state to Foreign Countries		
ST 38	# of all other consumer transmission transactions from in-state to U.S. states and territories		
ST 39	\$ amounts received for all other consumer transmission (outbound) from in-state to U.S. states and territories		
PAYMENT	T INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)		
ST 40	Total # of payment instruments issued/sold		
ST 41	Total \$ amount of payment instruments issued/sold		
STORED V	(ALUE		
ST 42	# of stored value issued/sold		
ST 43	\$ amount of stored value issued/sold		
CHECK CA	ISHING		
ST 44	# of checks cashed		
ST 45	\$ amount of checks cashed		
FIAT CUR	RENCY EXCHANGE		
ST 46	# of currency transactions completed		
ST 47	\$ amount of currency transactions completed		
VIRTUAL	CURRENCY		
ST 48	# of Virtual Currency to Virtual Currency Transactions		
ST 49	\$ amount of Virtual Currency to Virtual Currency Transactions		
ST 50	# of Virtual Currency to U.S. Dollar Transactions		
ST 51	\$ amount of Virtual Currency to U.S. Dollar Transactions		
ST 52	# of U.S. Dollar to Virtual Currency Transactions		
ST 53	\$ amount of U.S. Dollar to Virtual Currency Transactions		

PART III: PERMISSIBLE INVESTMENT REPORT⁶

⁶ Reported at company level. To determine compliance to state specific permissible investment regulations, regulators will utilize the NMLS Data Analytics Module where they can select only certain permissible investment categories to calculate investment percentages compared to the whole.

PERMISSIBLE INVESTMENTS (NOT STATE SPECIFIC)

MONEY T	RANSMISSION, STORED VALUE, PAYMENT INSTRUMENTS		% of Total	
PI 1	Domestic Cash on Hand and in Bank (do not include items reported in PI3)		Auto-populated	
PI 2	Deposits in Foreign Banks		Auto-populated	
51.2	Time deposits, savings deposits, demand deposits, certificate of deposits,			
PI 3	or senior debt obligations of insured depository institutions		Auto-populated	
PI 4	Irrevocable Letter of Credit		Auto-populated	
PI 5	Due from agents (net of allowance for doubtful accounts)		Auto-populated	
PI 6	investments rated A or it's equivalent and above		Auto-populated	
PI 7	Investments rated BBB or it's equivalent and lower or non-rated		Auto-populated	
PI 8	Investments in U.S. treasury securities		Auto-populated	
PI 9	Other Investments		Auto-populated	
PI 10	Total Permissible Investments	Auto-populated	Auto-populated	
PI 11	Amount pledged or restricted		Auto-populated	

MONEY TRANSMISSION (ADD'L SECTION FOR MT LICENSEES)			% of Total
PI 12	Total Domestic Outstanding Transmission Liability	Auto-populated	Auto-populated
PI 13	Total Domestic Average Daily Outstanding Transmission Liability (ADTL)		Auto-populated

VIRTUAL	VIRTUAL CURRENCY (ADD'L SECTION FOR VC LICENSEES)		% of Total
PI 14	Virtual Currency Balance Held on Behalf of Customers (in U.S. Dollars)		Auto-populated
PI 15	Virtual Currency Balance not Held on Behalf of Customers (in U.S. Dollars)		Auto-populated
PI 16	Other Investments		Auto-populated
PI 17	Total VC coverage	Auto-populated	Auto-populated
PI 18	Outstanding Virtual Currency Liability	Auto-populated	Auto-populated

MSB CALL REPORT GLOSSARY

Financial Condition (Not State Specific)

SSETS		
FC1	Cash on Hand and in Bank	Include cash on hand, cash in transit, checks, drafts, ACH debits in the process of clearing or collection in the United States, certificates of deposit (CDs), and demand and time balances of accounts at federally insured financial institutions the United States and banks in foreign countries.
FC2	Due from agents (net of allowance for doubtful accounts)	Include all moneys owed to licensee from receiving and paying agents net of allowance for doubtful accounts. Also include all money advanced or pre-funded to a paying agent for the purposes of paying transmission liability to beneficiarie This is a gross figure. Do not net any advances or pre-funds against transmission liability.
FC3	Amount of allowance for doubtful accounts	Dollar amount of allowance for doubtful accounts related to the amount due from agents.
FC4	Accounts receivable (net of allowance for doubtful accounts)	Money owed to licensee by a customer or other party for products and services provided on credit net of allowance for doubtful accounts. This sum represents amounts that are owed to the licensee which are not transmission liabilities or long term extensions of credit.
FC5	Amount of allowance for doubtful accounts	Dollar amount of allowance for doubtful accounts related to accounts receivable.
FC6	Inter-company receivables	Include all accounts receivable and notes receivable and other monetary obligations due from affiliates, shareholders, or parent corporation expected to b paid during the current operating cycle. These items should be rounded on a gross basis, "debit balance."
FC7	Notes/other receivables	Include all note/other receivables other than intercompany receivables with the amount rounded on a gross basis, "debit balance."
FC8	Investments (including government securities)	Include all investments in government securities, marketable securities, bankers acceptances, commercial paper, etc. (See "Schedule RC-A – Investments")
FC9	Virtual currency (in U.S. dollars)	Any virtual currency held as an asset not held on behalf of a customer. This shall only include virtual currency held and solely controlled by the company. Amount must be entered in U.S dollar value.
FC10	Other current assets (i.e. prepaid, inventory, etc.)	Include other assets expected to be realized in cash, sold or consumed during th next year, i.e., inventory, prepaid, etc. Detail in section TBD if amount exceeds 20% of total.
FC11	Total current assets	Sum of lines FC1 through FC10 (excluding FC3 and FC5)
FC12	Premises, furniture, fixtures and equipment (net of accumulated depreciation)	Report the book value, less accumulated depreciation or amortization of all premises, furniture, fixtures and equipment purchased directly or acquired by means of a capital lease. Include any real estate purchased and intended to be used for future expansion. Do not deduct mortgages or loans on any such property. These should be reported as Liabilities.
FC13	Investments in subsidiaries not consolidated	Report the amount of the company's investment in the stock of all subsidiaries that have not been consolidated.
FC14	Goodwill and other intangibles	Report all non-monetary assets that cannot be seen, touched or physically measured and which are created through time and/or effort.
FC15	Other assets (Detail in section TBD if amount exceeds 20% of total)	Report all other assets not included above. Detail in section TBD if amount exceeds 20% of total. Sum of lines FC11 through FC15

ABILITIES	S AND EQUITY	
FC17	Accounts payable	Report all accounts payable, including moneys owed to receiving and paying agents. Items should be rounded on a gross basis, "credit balance."
FC18	Inter-company payables	Report all accounts payable, notes payable, and other monetary obligations to affiliates, shareholders, parent corporation expected to be liquidated during the current operating cycle and should be rounded on a gross basis, "credit balance."
FC19	Notes/other payables	Include non-intercompany payables and other notes payable expected to become due or payable in the next 12 months. This item should be rounded on a gross basis, "credit balance."
FC20	Outstanding money received for transmission liability	Report licensee's total amount of money received for transmission and not yet paid to beneficiaries. This amount should include all outstanding transmission liability. Liability may be extinguished only when transaction received by beneficiary bank.
FC21	Outstanding payment instruments	Report licensee's total amount of outstanding payment instruments (including money orders, and travelers' checks) not yet paid to beneficiaries or negotiated. This amount should include all outstanding payment instrument liability. Liability extinguished only when funds settled with beneficiary (entity the instrument is payable to).
FC22	Outstanding stored value	Report licensee's total amount of outstanding stored value. This amount should include all outstanding stored value liability. Liability extinguished only when received by merchant.
FC23	Outstanding virtual currency liability (in U.S. dollars)	Report licensee's total amount of outstanding virtual currency. This amount should include all outstanding virtual currency liability.
FC24	Other current liabilities (i.e., Accrued expenses, income tax payable, current portion of long term debt, etc.)	Include all other current liabilities that the licensee expects to satisfy within one year. Detail in section TBD if amount exceeds 20% of total.
FC25	Total Current Liabilities	Sum of lines FC17 through FC24
FC26	Long term notes payable	Include mortgages and other real estate secured loans as well as any notes due in excess of one year.
FC27	Other Liabilities (Detail in section TBD if amount exceeds 20% of total)	Report all other liabilities not included above. Detail in section TBD if amount exceeds 20% of total.
FC28	TOTAL LIABILITIES	Sum of lines FC25 through FC27
	SHAREHOLDER'S EQUITY	
FC29	Preferred stock	Report the amount of preferred stock outstanding and number of shares outstanding on their respective lines. This number should be the actual number outstanding. For example, 10,000 shares should be listed as 10,000, not 10. Different classes of stock should be combined to result in one figure.
FC30	number of shares outstanding (as actual number)	Total number of preferred stock shares outstanding.
FC31	Common stock	Report amount of outstanding, number of shares authorized and number of share outstanding on their respective lines. This number should be the actual number outstanding. For example, 10,000 shares should be listed as 10,000, not 10. Different classes of stock should be combined to result in one figure.
FC32	Number shares authorized (use actual number)	Total number of common stock shares authorized.
FC33	Number of shares outstanding (use actual number)	Total number of common stock shares outstanding.
FC34	Paid-in-capital in excess of par	Include amounts received in excess of par or stated value of stock.
FC35	Total Contributed Capital	Sum of lines FC29 through FC34 (excluding FC30, FC32, and FC33)
FC36	Retained earnings	Report the amount of retained earnings, including year to date net income. Do not include other comprehensive income on line FC40.
FC37	Other comprehensive income	Report the amount of other comprehensive income, including year to date adjustments. Other comprehensive income (loss) consists of net income (losses affecting shareholders' equity that, under Generally Accepted Accounting Principles are excluded from net income (loss). For example, comprehensive income (loss) consists of foreign currency translation adjustments, net unrealized
1007		holding gains (losses) on available for sale securities, accumulated net gains (losses) on cash flow hedges, and minimum pension liability adjustments.
FC38	Shareholder distribution	holding gains (losses) on available for sale securities, accumulated net gains
	Shareholder distribution TOTAL SHAREHOLDERS' EQUITY	holding gains (losses) on available for sale securities, accumulated net gains (losses) on cash flow hedges, and minimum pension liability adjustments.

	TATEMENT	
	REVENUES	
FC41	Fee income from money received for	Dollar amount of fee income from money received for money transmission.
1041	transmission	Include fees, service charges and commissions for money transmission only.
FC42	Fee income from sale issuance of payments	Dollar amount of fee income from sale issuance of payment instruments. Include
1042	instruments	fees, service charges and commissions for payment instruments only.
FC43	Fee income from sale issuance of stored value	
1010		service charges and commissions for stored value only.
FC44	Fee income from check cashing services	Dollar amount of fee income from check cashing services. Include fees, service
1044		charges and commissions for check cashing services only.
FC45	Fee income from currency exchange services	Dollar amount of fee income from currency exchange services. Include fees,
1010		service charges and commissions for currency exchange services only.
FC46	Interest and dividends	Include interest and fee income on loans, interest income on deposits with
1040		financial institutions and interest on investments including government securities
	Foreign exchange gains or losses	This is the earnings or loss incurred from buying and selling foreign currency
		connected with the licensees business. It is the difference between the cost and
FC47		the gain/loss of foreign exchange in converting a transaction to the currency of the
1047		receiving country. Also include amounts gained or lost from the difference
		between the exchange rate charged to customers and the rate at which the
		licensee is able to acquire the currency.
	Other income (Detail in section TBD if amount	3
FC48	exceeds 20% of total)	business other than the transmission of money, or the sale of payment instrumer
1040		and stored value. Detail in section TBD if amount exceeds 20% of total.
FC49	TOTAL REVENUE	Sum of lines FC41 through FC48
	EXPENSES	1
FC50	Salaries and employee benefits	Salaries and employee benefits for officers and employees.
FC51	Agent fees	Fees paid to the agent for services rendered on behalf of the licensee (domestic
1001		and international).
FC52	Rent	Expenses for the use of premises, equipment, furniture and fixtures, janitorial
1 002		services, utilities, etc.
	Interest expense	Include interest on deposits, mortgages, capital notes, borrowings from financia
FC53		institutions and obligations on capitalized leases. Do not include interest on
FC33		borrowings from principals, parent companies, subsidiaries or affiliates (Report
		this under line FC59.)
FC54	Depreciation and amortization	Expenses related to the write-off of non-earning assets in accordance with
FC54		generally acceptable accounting principles (GAAP).
FC55	Communication expense	Expenses related to telephone, facsimile, telegram, postage, and other related
1055		expenses.
FC56	Professional services expense	Expenses related to legal, accounting, consulting, examination fees, and other
1030		related expenses.
FC57	Marketing and promotion	Expenses related to advertising and the selling of goods and services.
	Insurance expense	Premium expense for fidelity insurance, surety bond, directors' and officers'
FC58		liability insurance and life insurance policies for which the licensee is the
		beneficiary.
FC59	Taxes and licenses	Expenses related to payroll and property taxes and regulatory and automobile
FC59		licenses.
	Other expenses (Detail in section TBD if	All other operating expenses not included in items FC49 through FC59. Include
5000	amount exceeds 20% of total)	on this line interest on borrowings from principals, parent companies,
FC60		subsidiaries or affiliates. Detail in section TBD if amount exceeds 20% of total.
FC61	TOTAL EXPENSES	Sum of lines FC50 through FC60
FC62	Income from Continuing Operations before	FC49 minus FC61
	Income Tax	
FC63	Income tax	Federal and state income tax on line FC62
FC64	Income from continuing operations	FC62 minus FC63
FC65	Discontinued operations, Net of tax effect	Income or (loss) from the sale of a segment of the business.
	Other comprehensive income/currency	Include net realized holding gains (losses) on available for sale securities,
	translation adjustments	accumulated net gains (losses) on cash flow hedges, foreign currency translatio
_		adjustments, and pension and other post-retirement plan related changes, other
FC66		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.
FOAT	Income before extraordinary items	Sum of lines FC64 through FC66
FC67		
FC67 FC68 FC69	Extraordinary items, net of tax effect Net Income (loss)	Material, unusual, nonrecurring or infrequent items. Sum of lines FC67 and FC68

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TRANSACTION ACTIVITY AT COMPANY LEVEL (BY ACTIVITY TYPE)

MONEY TRANSMISSION (INCLUDES BILL PAY AND BUSINESS TO BUSINESS)		
TA 1	# of bill pay transactions	Report the total number of bill pay transactions. Does not include other consumer
		related or business to business transmissions.
TA 2	\$ amounts received for bill pay transactions	Report the total dollar amount of bill pay transactions. Does not include other consumer related or business to business transmissions.
		Report the total number of business to business transactions. Does not include
TA 3	# of business to business transactions	bill pay or other consumer related transactions.
TA 4	\$ amounts received for business to business transactions	Report the total dollar amount of business to business transactions. Does not
14		include bill pay or other consumer related transactions.
T A 6	Total # of all other consumer transactions from U.S. states and	Report the total number of all other consumer transactions from U.S. states and
TA 5	territories to U.S. states and territories	territories to U.S. states and territories in the quarter. Does not include bill pay or business to business transactions.
		Report the total dollar amount of all other consumer transactions from U.S. states
TA 6	Total \$ amount received for all other consumer transmission from U.S. states and territories to U.S. states and territories	and territories to U.S. states and territories in the quarter. Does not include bill
		pay or business to business transactions.
T - T	Total # of all other consumer transactions from U.S. states and	Report the total number of all other consumer transactions transmitted to foreign
TA 7	territories to foreign countries	countries in the quarter. Does not include bill pay or business to business
		transactions. Report the total dollar amount of money received for all other consumer
TA 8	Total \$ amount received for all other consumer transmission from U.S.	transmission to be sent to foreign countries in the quarter. Does not include bill
	states and territories to foreign countries	pay or business to business transactions.
TA 9	TOTAL # of All Other Consumer Transmission Transactions	The total # of all other consumer transmission transactions for the quarter is
		automatically calculated.
TA 10	TOTAL \$ Amount of All Other Consumer Transmission Transactions	The total \$ Amount of all other consumer transmission transactions for the quarter is automatically calculated.
TA 11	TOTAL # of All Money Transmission Transactions	The total # of Transmission Transactions for the quarter is automatically
		calculated.
TA 12	TOTAL \$ Amount of All Money Transmission Transactions	The total \$ Amount of Transmission Transactions for the quarter is automatically
		calculated.
PAYMENT I	NSTRUMENTS (MONEY ORDERS, TRAVELERS CH	
TA 13	Total # of payment instruments issued/sold	Report total number of payment instruments sold in the quarter.
TA 14	Total \$ amount of payment instruments issued/sold	Report total dollar amount of payment instruments sold in the quarter.
STORED V	ALUE	
TA 15	Total # of stored value issued/sold	Report total number of stored value instruments sold in the quarter. Includes reloads.
TA 16	Total \$ amount of stored values issued/sold	Report total dollar amount of stored value sold in the quarter. Includes reloads.
CHECK CA		
TA 17	# of checks cashed	Report total number of checks cashed during the quarter.
TA 18	\$ amount of checks cashed	Report total dollar amount of checks cashed during the quarter.
TA 19	\$ amount of fees collected	Report total dollar amount of fees collected in the quarter.
TA 20	maximum percentage charged for check	Report the maximum percentage charged for a check during the quarter.
	ENCY EXCHANGE	
TA 21	# of currency transactions completed	Report total number of currency exchange transactions during the quarter.
TA 22 TA 23	\$ amount of currency transactions completed \$ amount of fees collected	Report total U.S. dollar amount of currency transactions during the quarter. Report total dollar amount of fees collected in the quarter.
VIRTUAL C		
		Report total number of virtual currency to virtual currency transactions completed
TA 24	Total # of Virtual Currency to Virtual Currency Transactions	during the quarter.
TA 05		Report total dollar amount of virtual currency to virtual currency transactions
TA 25	Total \$ amount of Virtual Currency to Virtual Currency Transactions	completed during the quarter (in U.S. Dollars).
TA 26	Total # of Virtual Currency to U.S. Dollar Transactions	Report total number of virtual currency to U.S. Dollar transactions completed
		during the quarter.
TA 27	Total \$ amount of Virtual Currency to U.S. Dollar Transactions	Report total dollar amount of virtual currency to U.S. Dollar transactions completed during the quarter (in U.S. Dollars).
		Report total number of U.S. Dollar to virtual currency transactions completed
TA 28	Total # of U.S. Dollar to Virtual Currency Transactions	during the quarter.
TA 29	Total \$ amount of U.S. Dollar to Virtual Currency Transactions	Report total dollar amount of U.S. Dollar to virtual currency transactions completed
		during the quarter (in U.S. Dollars).
TA 30	TOTAL # of Virtual Currency Transactions	The total # of transactions for the quarter is automatically calculated.
TA 31	TOTAL \$ Amount of Virtual Currency Transactions (in U.S. Dollars)	The total \$ Amount of all transactions for the quarter is automatically calculated.

TRANSACTION ACTIVITY BY STATE (BY ACTIVITY TYPE)

	ANSMISSION (INCLUDES BILL PAY	
ST 1	# of bill pay transactions initiated in-state	Report the total number of bill pay transactions initiated in-state. Does not include other consumer related or business to business transmissions.
	\$ amounts received for bill pay initiated in-	Report the total dollar amount of bill pay transactions initiated in-state. Does not
ST 2	state	include other consumer related or business to business transmissions.
07.0	# of business to business transactions initiated	Report the total number of business to business transactions initiated in-state.
ST 3	in-state	Does not include bill pay or other consumer related transactions.
ST 4	\$ amounts received for business to business	Report the total dollar amount of business to business transactions initiated-in
314	transactions initiated in-state	state. Does not include bill pay or other consumer related transactions.
	# of all other consumer transmission	Report the total number of all other consumer transactions from in-state to foreign
ST 5	transactions from in-state to Foreign Countries	countries in the quarter. Does not include bill pay or business to business
	<u> </u>	transactions.
07.0	\$ amounts received for all other consumer	Report the total dollar amount of money received for all other consumer
ST6	transmission (outbound) from in-state to	transmission from in-state to be sent to foreign countries in the quarter. Does not
	Foreign Countries # of all other consumer transmission	include bill pay or business to business transactions. Report the total number of all other consumer transactions from in-state to be sen
ST 7	transactions from in-state to U.S. states and	to another state or territory of the United States in the quarter. Does not include
017	territories	bill pay or business to business transactions.
		Report the total dollar amount of money received for all other consumer
07.0	\$ amounts received for all other consumer	transmission from in-state to be sent to another state or territory of the United
ST 8	transmission (outbound) from in-state to U.S.	States in the quarter. Does not include bill pay or business to business
	states and territories	transactions.
ST 9	TOTAL # of All Other Consumer Transmission	The total # of All Other Consumer In-State Transmission Transactions for the
010	Transactions in-State	quarter is automatically calculated.
ST 10	TOTAL \$ Amount of All Other Consumer	The total \$ Amount of All Other Consumer In-State Transmission Transactions for
	Transmission Transactions for State	the quarter is automatically calculated.
ST 11	TOTAL # of All Money Transmission	The total # of All In-State Transmission Transactions for the quarter is
	Transactions initiated in-state TOTAL \$ Amount of All Money Transmission	automatically calculated. The total \$ Amount of All In-State Transmission Transactions for the quarter is
ST 12	Transactions initiated in-state	automatically calculated.
	NSTRUMENTS (MONEY ORDERS, 1	
ST 13	# of payment instruments issued/sold in-state	Report total number of payment instruments sold in-state during the quarter.
ST 14	\$ amounts of payment instruments issued/sold in-state	Report total dollar amount of payment instruments sold in-state during the quarter.
TORED V	•	
	ALUE	Depart total number of stared value instruments cold in state during the questor
ST 15	# of stored value issued/sold in-state	Report total number of stored value instruments sold in-state during the quarter. Includes reloads.
		Report total dollar amount of stored value sold in-state during the guarter. Includes
ST 16	\$ amount of stored values issued/sold in-state	reloads.
HECK CA	SHING	
ST 17	# of checks cashed in-state	Report total number of checks cashed in-state during the quarter.
ST 18	\$ amount of checks cashed in-state	Report total dollar amount of checks cashed in-state during the quarter.
ST 19	\$ amount of fees collected in-state	Report total dollar amount of fees collected in-state during the quarter.
	maximum percentage charged for check in-	Report the maximum percentage charged for a check in-state during the quarter.
ST 20	state	······································
	ENCY EXCHANGE	
ST 21		Report total number of currency exchange transactions during the quarter.
		Report total U.S. dollar amount of currency transactions in-state during the
ST 22	state	quarter.
ST 23	\$ amount of fees collected in-state	Report total dollar amount of fees collected in-state in the quarter.
	URRENCY	
	# of Virtual Currency to Virtual Currency	Report total number of virtual currency to virtual currency transactions initiated in-
ST 24	Transactions Initiated In-State	state during the quarter.
OT OF		
ST 25	Transactions Initiated In-State	initiated in-state during the quarter (in U.S. Dollars).
ST OF	# of Virtual Currency to U.S. Dollar	Report total number of virtual currency to U.S. Dollar transactions initiated in-state
ST 26	Transactions Initiated In-State	during the quarter.
ST 27	\$ amount of Virtual Currency to U.S. Dollar	Report total dollar amount of virtual currency to U.S. Dollar transactions initiated in
0121	Transactions Initiated In-State	state during the quarter (in U.S. Dollars).
ST 28	# of U.S. Dollar to Virtual Currency	Report total number of U.S. Dollar to virtual currency transactions initiated in-state
0.20	Transactions Initiated In-State	during the quarter.
	\$ amount of U.S. Dollar to Virtual Currency	Report total dollar amount of U.S. Dollar to virtual currency transactions initiated in
ST 29		
ST 29	Transactions Initiated In-State	state during the quarter (in U.S. Dollars).
ST 29 ST 30	TOTAL # of Virtual Currency Transactions Initiated	state during the quarter (in U.S. Dollars). The total # of in-state transactions for the quarter is automatically calculated.

COMPANY OWNED LOCATION AND AGENT TRANSACTIONS BY LOCATION

	OWNED LOCATION AND AGENT T	
MONEY TR	ANSMISSION	
ST 32	# of bill pay transactions initiated in-state	Report the total number of bill pay transactions initiated in-state. Does not include
		other consumer related or business to business transmissions.
ST 33	\$ amounts received for bill pay initiated in-	Report the total dollar amount of bill pay transactions initiated in-state. Does not
	state # of business to business transactions initiated	include other consumer related or business to business transmissions. Report the total number of business to business transactions initiated in-state.
ST 34	in-state	Does not include bill pay or other consumer related transactions.
	\$ amounts received for business to business	Report the total dollar amount of business to business transactions initiated-in
ST 35	transactions initiated in-state	state. Does not include bill pay or other consumer related transactions.
		Report the total number of all other consumer transactions from in-state to foreign
ST 36	# of all other consumer transmission	countries in the quarter. Does not include bill pay or business to business
0.00	transactions in-state to foreign countries	transactions.
	\$ amounts Received for all other consumer	Report the total dollar amount of money received for all other consumer
ST 37	• • • • • • • • • • • • • • • • • • • •	transmission from in-state to be sent to foreign countries in the quarter. Does not
	transmission from in-state to foreign countries	include bill pay or business to business transactions.
	# of all other consumer transactions from in-	Report the total number of all other consumer transactions from in-state to be sent
ST 38	state to U.S. States and Territories	to another state or territory of the United States in the quarter. Does not include
		bill pay or business to business transactions.
	\$ Received for all other consumer transmission	Report the total dollar amount of money received for all other consumer
ST 39	(outbound) from in-state to U.S. States and	transmission from in-state to be sent to another state or territory of the United
0100	Territories	States in the quarter. Does not include bill pay or business to business
		transactions.
PAYMENT I	INSTRUMENTS (MONEY ORDERS, 1	IRAVELERS CHECKS, DRAFTS)
ST 40	Total # of payment instruments issued/sold	Report total number of payment instruments sold during the quarter for the
0140		identified authorized agent.
ST 41	Total \$ amount of payment instruments	Report total dollar amount of payment instruments sold during the quarter for the
	issued/sold	identified authorized agent.
STORED V	ALUE	
ST 42	# of stored value issued/sold in-state	Report total number of stored value instruments sold during the quarter for the
01.12		identified authorized agent.
ST 43	\$ amount of stored value issued/sold in-state	Report total dollar amount of stored value sold during the quarter for the identified
		authorized agent.
CHECK CA	SHING	
ST 44	# of checks cashed	Report total number of checks cashed during the quarter for the identified agent.
ST 45	\$ amount of checks cashed	Report total dollar amount of checks cashed during the quarter for the identified
		agent.
	ENCY EXCHANGE	
ST 46	# of currency transactions completed	Report total number of currency exchange transactions during the quarter.
ST 47	\$ amount of currency transactions completed	Report total U.S. dollar amount of currency transactions during the quarter for the
		identified agent.
VIRTUAL C		
ST 48	# of Virtual Currency to Virtual Currency	Report total number of virtual currency to virtual currency transactions during the
01.10	Transactions	quarter.
ST 49	\$ amount of Virtual Currency to Virtual Currency	Report total dollar amount of virtual currency to virtual currency transactions during
	Transactions	the quarter (in U.S. Dollars).
ST 50	# of Virtual Currency to U.S. Dollar	Report total number of virtual currency to U.S. Dollar transactions during the
	Transactions	quarter.
ST 51	\$ amount of Virtual Currency to U.S. Dollar	Report total dollar amount of virtual currency to U.S. Dollar transactions during the
	Transactions	quarter (in U.S. Dollars).
ST 52	# of U.S. Dollar to Virtual Currency	Report total number of U.S. Dollar to virtual currency transactions during the
	Transactions	quarter. Report total dollar amount of U.S. Dollar to virtual currency transactions during the
ST 53	\$ amount of U.S. Dollar to Virtual Currency	, , , , , , , , , , , , , , , , , , , ,
	Transactions	quarter (in U.S. Dollars).

PERMISSIBLE INVESTMENTS (NOT STATE SPECIFIC)

MONEY	MONEY TRANSMISSION, STORED VALUE, PAYMENT INSTRUMENTS		
		Include cash on hand, cash in transit, checks, drafts, ACH debits in the	
PI1	Domestic Cash on Hand and in Bank (do not include items reported in PI 3)	process of clearing or collection in the United States at federally insured financial institutions in the United States. Does not include items reported in PI 3.	
PI2	Deposits in Foreign Banks	Include certificates of deposit (CDs), and demand and time balances of accounts at federally insured financial institutions in foreign banks.	
PI3	Time deposits, savings deposits, demand deposits, certificate of deposits, or senior debt obligations insured depository domestic institutions	Include, certificates of deposit (CDs), senior debt obligations, and demand and time balances of accounts at federally insured financial institutions in the United States.	
PI4	Irrevocable Letter of Credit	Report amount of irrevocable letters of credit issued by a federally insured financial institution.	
PI5	Due from agents (net of allowance for doubtful accounts)	Money owed to licensee by a customer or other party for products and services provided on credit net of allowance for doubtful accounts. This sum represents amounts that are owed to the licensee which are not transmission liabilities or long term extensions of credit.	
PI6	investments rated A or it's equivalent and above	Report the amount of investments that are rated A or its equivalent or above. Only include investments that are rated by a nationally recognized organization that rates securities	
PI7	Investments rated BBB or it's equivalent and lower or non-rated	Report the amount of investments that are rated below A or below the equivalent of A, and/or not rated.	
PI8	Investments in U.S. treasury securities	Report investment securities that are an obligation of the United States or a department, agency, or instrumentality thereof (bills, notes and bonds).	
PI9	Other Investments	Report all other investments not included above. Detail in section TBD if amount exceeds 20% of total.	
PI 10	Total Permissible Investments	Sum of lines PI6 through PI9	
PI 11	Amount pledged or restricted	Report the amount pledged or restricted.	

		T LICENSEES)
PI 12 Total Domestic Outstan	nding Transmission Liability	Automatically populated with amount entered in FC20.
Total Domestic Averag	e Daily Outstanding	Report the average daily transmission liability ("ADTL") for the quarter.
PI 13 Transmission Liability ((ADTL)	

VIRTUAL CURRENCY (ADD'L SECTION FOR VC LICENSEES)		
D11/	Virtual Currency Balance Held on Behalf of Customers (in U.S. Dollars)	Report the U.S. Dollar amount of virtual currency held on behalf of customers. This is virtual currency that resides in an account maintained by the entity where.
P115	Virtual Currency Balance not Held on Behalf of Customers (in U.S. Dollars)	Report the U.S. Dollar amount of virtual currency fully controlled and not held on behalf of a customer.
PI 16	Other Investments	Report all other virtual currency investments not included above. Detail in section TBD if amount exceeds 20% of total.
PI 17	Total VC coverage	Sum of lines PI14 through PI16
PI 18	Outstanding Virtual Currency Liability	Automatically populated with amount entered in FC23.