



**RESPONSE TO COMMENTS RECEIVED DURING COMMENT PERIOD
ON THE NMLS MONEY SERVICES BUSINESSES CALL REPORT
June 2016**

State Regulatory Registry LLC
1129 20th Street NW, Ninth Floor
Washington, D.C. 20036-4307

Background

On October 5, 2015 the State Regulatory Registry LLC (SRR)¹ invited [public comments](#) on the proposed NMLS Money Services Businesses Call Report (MSBCR). The deadline for submitting comments was December 5, 2015. All submitted comments are available on the [NMLS Resource Center](#). After review of the comments by the MSB Call Report Working Group (Addendum A) and the [NMLS Policy Committee](#) (NMLSPC)², the following is a summary of the comments received with SRR's responses regarding proposed adjustments to the MSB Call Report. With the feedback received, SRR intends to post a final version of the MSB Call Report by July 1, 2016 and targets deploy through NMLS in the first quarter of 2017 to facilitate Q1 2017 financial, transactional, and permissible investment MSB Call Report submission by licensees.

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.

¹ State Regulatory Registry LLC (SRR) is a nonprofit subsidiary of the Conference of State Bank Supervisors (CSBS) that operates NMLS on behalf of state financial services regulatory agencies.

² To assist it in making decisions and handling operational matters, the SRR Board of Managers created the NMLS Policy Committee (NMLSPC) which is comprised of 11 state regulators. The NMLS Policy Committee provides SRR a mechanism to make policy decisions for NMLS with regards to its impact on meeting state licensing regulations. Decisions are made after considering input from NMLS Participating State Agencies, licensees and industry. The roster of the NMLSPC can be found at

<http://mortgage.nationwidelicencingsystem.org/about/Documents/2016.2.1%20NMLS%20POLICY%20COMMITTEE%20LIST.pdf>

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 were the subject of the Request for Comments.

The NMLS MSB Call Report Working Group reviewed the public comments received and modified the report draft including data field definitions. These recommended modifications were submitted to the NMLS Policy Committee. The roster of the NMLS MSB Call Report Working Group can be found in *Addendum A* of this Response to Comments.

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

Responses to Comments

At the end of the December public comment period, SRR had received submissions from eight commenters with respect to the proposed Money Services Businesses Call Report. Commenters included industry trade groups, state licensed MSB companies and industry representatives. The comments were reviewed by the MSB Call Report Working Group, and the NMLS Policy Committee.

The following is a summary of the major topics raised in the comments, SRR's response to those comments, and proposed changes to the MSB Call Report. The final version of the MSB Call Report is proposed to be posted by July 1, 2016 with deployment in NMLS scheduled for the first quarter of 2017 to facilitate Q1 2017 financial, transactional, and permissible investment MSB Call Report submission.

General Comments

Additional Regulatory Burden Concern

Four commenters expressed concerns related to the creation of the proposed MSB Call Report not replacing existing state reporting requirements and instead creating additional regulatory burden and work for companies that are licensed in states that adopt the report. One commenter also stated that they viewed the report as adopting the most expansive state's reporting requirements, and requirements of states that are not currently on NMLS. These commenters also expressed concerns around not having standard definitions between the states that they felt would lead to states still requiring state specific reports in addition to the MSB Call Report.

SRR Response:

One goal of the MSB Call Report is to replace existing state reporting requirements. Elimination of state reports may occur after the state is comfortable with the consistency of data submitted through the report. The ability for a state to no longer require a state specific report may also be impacted by state statutes and other regulations that prevent the immediate elimination of the state report.

Related to the MSB Call Report adopting the most expansive state's reporting requirements, the more inclusive submission is intended to satisfy the greatest number of state minimum reporting requirements, therefore, reducing the need for additional submissions outside NMLS. Although certain sections, such as the financial condition, may be more expansive than any one state's requirements, it is only required to be submitted once for all states.

To address the current variation of data definitions from state to state, the MSB Call Report includes standardized definitions for each data field included in the report. In the report, the data reported from state to state will not vary and must be consistent with the provided definition. To enable states to evaluate compliance with unique state requirements, reports and other tools in NMLS will allow regulators to drill down on data submitted and be alerted to potential issues of non-compliance. Beyond this, certain states have already expressed interest in adjusting their definitions, when possible, to align with the new MSB Call Report standardized definitions.

The MSB Call Report is also intended to improve the transparency of the MSB industry and lead to greater coordination within the state regulatory system all while further strengthening the ability for industry and regulators to prevent bad actors from harming consumers. Data provided in the report will also permit states to complete risk based exam planning that may lead to fewer exams for certain companies because regulators will be able to better allocate resources based on each company's risk profiles. These efficiencies and improvements in coordination will benefit both regulators and industry.

General Support

Three commenters voiced general support for the report and outcomes it is attempting to achieve. One of these commenters also stated they understood that initially not all states would be able to eliminate their state specific reporting requirements and that it would take time for full adoption.

SRR Response:

The working group appreciates the comments and looks forward to working with states and licensees to fully achieve all stated goals of the MSB Call Report.

State Adoption and Implementation Timeline

Five commenters expressed concern over not knowing how many states will initially adopt the report and some requested that the report not be required in the System until all states on NMLS agree to adopt the report. One commenter requested 6 months and another 18 months from the time the final report format is released to the initial required submission date. These commenters stated that this time is needed in order to properly update internal systems to capture and categorize the data as requested in the report.

SRR Response:

The revised report will be sent to state regulators to determine the initial group of adopting states. States will announce adoption of the MSB Call Report as they make the decision. Recognizing the importance of advance notice, SRR will coordinate with the states who will be adopting in Q1 2017 to announce as soon as possible and provide information on the NMLS Resource Center as well as notify relevant licensees by email. It is not anticipated or required for all states on NMLS to adopt or utilize the MSB Call Report during the initial implementation phase.

To provide licensees ample time to adjust internal transaction tracking and accounting systems and prepare to complete uploads in the System, the final version of the report and all related details are scheduled to be posted by July 2016. The first required submission deadline of Q1 2017 data will occur May 15, 2017. This initial reporting deadline of May 15, 2017 may also be re-evaluated to ensure licensees are provided enough time to complete the initial submission of the report.

SRR anticipates that several states will adopt in the above timeframe and strongly urges companies to begin preparing as soon as the final MSB Call Report details are released.

Information Sharing

Two commenters stated that they were concerned with the sharing of information contained in the report amongst the state regulators on the System and use of reported data at the aggregate level. Specifically, concerns related to the ability of licensees to maintain the confidentiality of certain information when various state administrative procedure laws come into play and the use of the data at the aggregate level not containing all industry data because not all states are on the system. One other commenter asked if advance notice could be provided to the company prior to release of aggregate data.

SRR Response:

These concerns were reviewed and it has been determined that, similar to other data in the System, the sharing of information amongst state regulators is specifically permitted under 12 U.S. Code § 5111 of the SAFE Act. Section 5111 permits information and material in NMLS to be shared with all state and federal regulatory officials with mortgage or financial services industry oversight authority without the loss of privilege or the loss of confidentiality protections provided by federal and state laws.

Related to use of aggregate data, any release of aggregated data will be consistent with how data is currently released with disclaimers as to states that are not using NMLS at the time to license MSBs. It is made clear in aggregated data reports that they cover only states and licensees that are on NMLS. Given that NMLS is currently used for MSB licensing by the majority of U.S. states and territories (34 as of February 2016) with additional agencies added each year, SRR believes that the system already includes all nationwide and the vast majority of regional companies.

Concerning advanced notice prior to release of aggregated data, the current NMLS Industry Terms of Use (Section 4-E) permits the release of aggregated data. This NMLS Industry Terms of Use is presented and accepted by the user at each system log in. SRR also posts aggregated data reports on the NMLS Resource Center and creates news system alerts related to the availability of new reports.

Report Submission Related Comments

Reporting Frequency

Two commenters noted that the majority of states do not currently require financial or transactional data on a quarterly basis and that quarterly reporting will add additional burden. One other commenter suggested that quarterly reporting would be best facilitated if it was reported as the activity for the specific quarter and not on a year to date basis (as proposed). Additionally, one commenter stated that the quarterly basis is reasonable, but would like clarification on what would occur in states that permit reporting outside of a calendar quarter schedule.

SRR Response:

The working group determined that regular reporting of transactional activity, permissible investment compliance, and financial information is a highly effective tool in monitoring a company's activities. This regular and consistent reporting will provide regulators with appropriate and timely information to plan examinations, collect assessments, determine compliance with permissible investment requirements and understand the overall condition of the companies they supervise. The financial condition, companywide³ and state transactions, and permissible investment reports will all remain required on a quarterly basis.

Addressing the comment on year to date data, the working group agreed that data submitted should be based on the activity that occurred during the quarter and not on a year to date basis. The report has been adjusted to require reporting of the activity that occurred during the quarter.

Related to the variance in certain states that permit financial information to be reported in accordance with a company's own fiscal quarter, the MSB Call Report would be expected to be submitted based on the unaudited activity during the calendar quarter. Any audited financial statement requirements based on a company's fiscal quarters would continue to be submitted through NMLS as part of the Company (MU1) financial statement section external of the MSB Call Report.

³ Not including companywide transaction country destination reporting that will only be required on an annual basis.

With regard to transaction destination country reporting, the group considered the need and the effort required to produce the data on a quarterly basis. The group determined annual reporting of the destination country data included within the Q4 submission would be adequate.

Adjustments to Submitted Reports

Two commenters asked for clarification on if and how licensees would be able to modify previously submitted quarterly reports due to corrections or other adjustments being required.

SRR Response:

Licensees are permitted to revise previously submitted quarterly reports up to 24 months after the report is submitted. Any adjustment in a previous quarter will be reported as a correction to that quarter. This is the same functionality that is available with the NMLS Mortgage Call Report and addresses the need for revisions and adjustments to quarterly reports submitted by licensees.

Report Upload Functionality

One commenter requested that bulk upload functionality, at a minimum, be offered for agent transaction information reporting.

SRR Response:

Bulk upload ability is currently planned to be made available for all sections of the report. This includes agent transaction reporting⁴, if required by the state the entity is licensed. The Uniform Authorized Agent Reporting (UAAR) listing of agents would be utilized to facilitate the reporting of agent transaction information.

Sections Required Based on Company Activities

One commenter requested clarification on how the System will identify what specific activity information will be required on a state-by-state basis.

SRR Response:

For the purposes of the report, the activities and states identified on each licensee's current NMLS Company (MU1) Form in NMLS will determine what activity sections in the report must be completed. Each state agency determines which licenses are required to complete activity specific sections (check cashing, money transmission, etc.) of the MSB Call Report. Only companies that have selected activities on their Company (MU1) Form that the state regulator has indicated the MSB Call Report is required for will complete the report.

⁴As noted in the response, agent transaction reporting has been postponed to a later release/version of the MSB Call Report.

Financial Condition Section Comments

Existing Financial Statement Requirements in NMLS

One commenter requested clarification as to whether MSBs will be notified through NMLS whether completion and submission of a “Compiled, Reviewed or Audited financial statement” is required, and by which state(s) in addition to and/or in lieu of the Report.

SRR Response:

Currently, the System proactively notifies licensees when a state in which they’re licensed in requires a financial statement must be submitted through the Company (MU1) filing in the financial statement section. This occurs 90 and 15 days prior to the financial statement submission deadline. To determine the type of financial statement required, a full list of state financial statement requirements is available on the NMLS Resource Center. This list will be updated based on the potential elimination of quarterly financial statement requirements due to the submission of the MSB Call Report financial Condition Section. Outside of the call report enhancement, functionality can be considered for the addition of a new/enhanced financial statement license item in NMLS.

Consolidated Financial Statement Requirements

A commenter asked if licensees that currently submit a consolidated financial statement will be exempt from the financial condition section of the MSB Call Report and continue to submit consolidated financials elsewhere in the System. They also felt that requiring them to produce a separate set of financial data is both costly and burdensome.

SRR Response:

Consolidated audited financial statements will continue to be submitted outside of the MSB Call Report, but the financial reporting completed in the MSB Call Report is intended to be a non-consolidated self-reported financial statement. The working group felt that this information should already be recorded at an entity level and should not be as burdensome since it is only being submitted once and what is being submitted in the MSB Call Report is not an audited statement.

Financial Condition Section Definition Adjustments

Various commenters’ submitted feedback related to financial condition data field definitions.

- FC 1 (Cash on Hand and in Bank): One commenter requested to further clarify the definition of Cash on Hand and in Bank to amend it to include “ACH credits in the process of clearing”. The commenter also stated this would closer align the definition with existing GAAP reporting principles.

SRR Response: The working group agreed with this suggestion and adjusted the definition from “ACH debits in the process of clearing...” to “ACH credits in the process of clearing...”
To ensure consistency between various sections of the report, the working group adjusted PI 1 (Domestic Cash on Hand and In Bank) in the same manner to read “ACH credits in the process of clearing...”

- FC 4 (Accounts receivable): One commenter noted that this definition should be expanded to include amounts owed to the licensee from consumers and customers (e.g. biller clients for bill payment).

SRR Response: These amounts should already be captured in FC 4 (Accounts Receivable) and are covered by the definition provided for this entry. No adjustment was made.

- FC 8 (Investments): One commenter asked if there will be a separate schedule created to report the details of investments as per the definition of FC8 in the Glossary?

SRR Response: The working group determined that there will not be a separate investment schedule required as part of the report submission. "See schedule RC-A Investment" has been removed from the definition for FC8.

- FC 20 (Outstanding money received for transmission liability): Two commenters stated that FC20 does not properly align with GAAP recognized reporting practices and appears to not contemplate business models in which liability may be extinguished by the licensee when funds are pushed to an intermediary.

SRR Response: FC20 was reviewed by the regulator working group and it was determined that "liability may be extinguished only when transaction received by beneficiary bank" should be removed.

- FC 21 (Outstanding Payment Instruments): Two commenters asked if there will be agreement between the regulators regarding the definition of "outstanding" payments and what is considered a stored value and payment instrument. Two commenters also stated that the current definition including: "This amount should include all outstanding liability. Liability extinguished only when funds settled with beneficiary (entity the instrument is payable to)" is inconsistent with GAAP and the sentence should be deleted. One commenter also suggested that "or negotiated" be removed from the definition.

SRR Response: States that adopt the MSB Call Report adopt the definition for call report submission purposes as stated in the definitions section for FC 21 (Outstanding Payment Instruments). Licensees are not expected to vary from state to state on what they enter in the report in this data field.

The working group did determine that "This amount should include all outstanding liability. Liability extinguished only when funds settled with beneficiary (entity the instrument is payable to)" should be removed. It has been removed from the definition.

Related to removing "or negotiated", the working group felt it was relevant to the definition, but clarified that "Outstanding Payment Instruments" should include payment instruments issued on behalf of others. The complete definition now reads "Report licensee's total amount of outstanding payment instruments (including money orders, and travelers' checks) issued on behalf of others and not yet paid to beneficiaries or negotiated. This amount should include all outstanding payment instrument liability."

- FC 22 (Outstanding stored value): Two commenters stated that the current definition including "Liability extinguished only when received by merchant" is inconsistent with GAAP and the sentence should be deleted.

SRR Response: FC22 was reviewed by the regulator working group and it was determined that "liability extinguished only when received by merchant" should be removed.

- FC 59 (Taxes and Licenses): Two commenters asked for clarification of Line FC59 asking if it intended for licensing fees to be considered taxes for the purposes of this report. Another commenter felt that FC59 was not applicable to money transmitter licensees.

SRR Response: FC59 was reviewed by the regulator working group and determined to not be a necessary breakout. It has been removed.

Transactional Activity Sections Comments

Transaction Definitions

- One commenter asked for clarification if transaction fields that indicated "in-state to U.S. state" transactions excluded in-state to in-state transactions.

SRR Response: Transaction data fields that indicate "in-state to U.S. state" are meant to include transactions that involve in-state to in-state recipients. The definition has been adjusted to make it clearer that in-state to in-state transactions should be included.

- One commenter asked if "business to business transactions" is intended to include payments made to another business on the customer's behalf, or payments made to another business in the course of conducting a licensee's own affairs.

SRR Response: Business to business transactions were not intended to include payments made to another business in the course of conducting a licensee's own affairs. The definition was intended to cover only money transmission transactions between commercial entities. After further review of existing state reporting requirements, and comments received, the working group removed the "business to business" transactions break-out. The working group felt it was unnecessary at this time.

- Three commenters had questions concerning the business to business and bill pay transaction breakouts in the companywide and state transaction reporting sections. Specifically there was confusion on what is meant by bill pay transactions and a potential overlap was identified with the business to business transactions breakout. Additionally two of these commenters did not see the benefit to state regulators of including this in the report.

SRR Response: After further review of existing state reporting requirements, and comments received, the working group removed the "bill pay" and "business to business" transactions break-outs. The working group felt they were unnecessary at this time.

Transaction Country Destination Reporting

Commenters expressed concern with the reporting of country transaction information through the MSB Call Report. Mainly, it was stated that only a small number of states currently require country transaction information to be reported.

SRR Response:

The working group determined that transaction data that includes country destination information should be included in the MSB Call Report. They felt it is of crucial importance in determining risk and performing a complete analysis of each company and aligns with existing guidance related to monitoring risk. As stated in the BSA/AML Examination Manual for MSBs⁵, identifying geographic locations that may pose a higher risk of money laundering or terrorist financing is essential to MSB risk assessment. The manual also states that MSBs should understand and evaluate the specific risks associated with doing business in, processing transactions for customers from, or facilitating transactions involving certain geographic locations.

To address concerns with burden, the working group decided that transaction country destination information would be required on a yearly basis, rather than quarterly, as part of the Q4 submission of the MSB Call Report. Included in the Q4 report would be the full calendar year's transaction country destination volume for the licensee. All countries transmitted to during the year would be included in the report. Sections IV(a) and IV(b) were included to collect this information on a yearly basis.

Company Owned Location and Agent Transaction Detail

Commenters expressed concern with the Company Owned Location and Agent Transaction Detail section. Many said location level reporting is currently only required by a small number of states and that including it in the report would lead to more states requiring it to be submitted. Additionally, one commenter asked to clarify if the agent reporting was at the aggregate level for the entire state or reported for each individual agent.

SRR Response:

Based on the comments received and group discussion related to implementation, the working group decided that the Company Owned Location and Agent Transaction Detail Section (Part II(c)) will not be included in the initial roll-out of the report. Part II(c) will likely be included in a later version, date to be determined, of the report. Any states requiring agent level specific transactional details will continue to require this outside of the MSB Call Report.

When added, the Company Owned Location and Agent Transaction Detail Section (Part II(c)) is intended to be completed at the location level in states that require this level of reporting. Meaning, the data fields for this section would be completed for each location in states that choose to require Part II(c).

⁵ https://www.fincen.gov/news_room/rp/files/MSB_Exam_Manual.pdf

Additional Transaction Reporting Fields

One commenter requested that additional transaction-related fields be added to the report. These fields included, a distinction between the licensee's' and a third party's transaction, a breakdown of the type of checks cashed, currency types exchanged, and distinction between prepaid card purchases and reloads. The commenter also asked to include a section on transaction volume and principal handled via other licensed entities (example a company that has its own service but also is an agent for another company).

SRR Response:

The working group evaluated the request to add these additional fields and determined that at this time these fields will not be included in the report. They may be considered for a later phase or version of the report.

Related to the request to add a section on transaction volume and principal handled via other licensed entities, each licensed entity should submit a unique report that includes their own transaction data.

Permissible Investments Section Comments

Permissible Investment Reporting

- Two commenters provided general questions about the permissible investment reporting section related to if it will replace all state permissible investment reports or if states will continue to require individual state permissible investment reports. Additionally, one commenter asked if the System will be able to display each state's permissible investment requirements and trigger notifications if a licensee is out of permissible investment compliance in a state they are licensed in.

SRR Response: The permissible investments reporting section is intended to capture major components utilized in state permissible investment requirements reporting and analysis. This is not meant to replace detailed permissible investment reporting that is required to be submitted in certain states. It is expected that many states will be able to rely on the MSB Call Report to satisfy their quarterly permissible investment reporting requirements.

Related to state specific permissible investment compliance notifications, it is expected that licensees be aware of each state's permissible investment requirements. This section is meant to act as a risk based monitoring tool for state regulators. SRR will further evaluate this request to determine if it is feasible. If not feasible in the initial roll-out of the report, it will be added for future consideration.

- PI 1 (Domestic Cash on Hand and in Bank): One commenter requested to further clarify the definition of Domestic Cash on Hand and in Bank and amend it to include "ACH credits in the process of clearing". The commenter also stated this would closer align the definition with existing GAAP reporting principles. Another commenter discussed further variance in state permissible investment requirements related to when cash can be considered permissible.

SRR Response: The working group agreed with this suggestion and adjusted the definition from “ACH debits in the process of clearing...” to “ACH credits in the process of clearing...” To further address variance in state permissible investment requirements related to cash, the working group broke out “Domestic Cash on Hand and in Bank” into two separate lines. The two new lines are “Deposits in Domestic Banks” and “Cash on Hand and in Transit”. This additional breakout better enables states to utilize the analytics module to generate a compliance calculation based on the specific permissible investment classifications permitted in their state.

- PI 12 (Total Domestic Outstanding Transmission Liability): One commenter stated there are inconsistencies in the definition provided between FC20, which is the total amount of money received for transmission and not yet paid to beneficiaries (implying that international liabilities should also be included) and PI12 which is the total domestic outstanding transmission liabilities. Clarification on how these liabilities should be reported was requested.

SRR Response: The feedback above was reviewed by the regulator working group and it was determined that since each company is expected to enter non-consolidated financial information, this entry should be consistent with what is entered in FC20. Additionally, the group agreed that foreign outstanding liabilities impact the financial condition of a company and are required to properly evaluate a company’s permissible investment coverage. To be inclusive of foreign outstanding liabilities, the working group removed “domestic” from the field name and definition. The adjusted field name is “Total Outstanding Transmission Liability”.

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

NMLS MSB Call Report

SECTION 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 current assets 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 overall total assets)	
FC16	TOTAL ASSETS	Auto-populated

LIABILITIES 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 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
SHAREHOLDERS' EQUITY		
FC29	Preferred stock	
FC30	Number of shares outstanding (as actual number)	
FC31	Common stock	
FC32	Number of 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	Other expenses (Detail in section TBD if amount exceeds 20% of total)	
FC60	TOTAL EXPENSES	Auto-populated
FC61	Income from Continuing Operations before Income Tax	Auto-populated
FC62	Income tax	
FC63	Income from continuing operations	Auto-populated
FC64	Discontinued operations, Net of tax effect	
FC65	Other comprehensive income/currency translation adjustments	
FC66	Income before extraordinary items	Auto-populated
FC67	Extraordinary items, net of tax effect	
FC68	Net Income (loss)	Auto-populated

NMLS MSB Call Report

SECTION II (a): COMPANY-WIDE TRANSACTIONS DETAIL

COMPANY-WIDE TRANSACTIONS DETAIL

MONEY TRANSMISSION		
TA 1	Total # of transactions from U.S. states and territories to U.S. states and territories	
TA 2	Total \$ amount received for transmission from U.S. states and territories to U.S. states and territories	
TA 3	Total # of transactions from U.S. states and territories to foreign countries	
TA 4	Total \$ amount received for transmission from U.S. states and territories to foreign countries	
TA 5	TOTAL # of All Money Transmission Transactions	Auto-populated
TA 6	TOTAL \$ Amount of All Money Transmission Transactions	Auto-populated
PAYMENT INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)		
TA 7	Total # of payment instruments issued/sold	
TA 8	Total \$ amount of payment instruments issued/sold	
STORED VALUE		
TA 9	Total # of stored value transactions	
TA 10	Total \$ amount of stored value transactions	
CHECK CASHING		
TA 11	# of checks cashed	
TA 12	\$ amount of checks cashed	
TA 13	\$ amount of fees collected	
TA 14	Maximum percentage charged for check	
FIAT CURRENCY EXCHANGE		
TA 15	# of currency exchange transactions completed	
TA 16	\$ amount of currency exchange transactions completed	
TA 17	\$ amount of fees collected	
VIRTUAL CURRENCY		
TA 18	Total # of Virtual Currency to Virtual Currency Transactions	
TA 19	Total \$ amount of Virtual Currency to Virtual Currency Transactions	
TA 20	Total # of Virtual Currency to U.S. Dollar Transactions	
TA 21	Total \$ amount of Virtual Currency to U.S. Dollar Transactions	
TA 22	Total # of U.S. Dollar to Virtual Currency Transactions	
TA 23	Total \$ amount of U.S. Dollar to Virtual Currency Transactions	
TA 24	Total # of Virtual Currency Exchange Transactions	
TA 25	Total \$ amount of Virtual Currency Exchange Transactions	
TA 26	TOTAL # of Virtual Currency Transactions	Auto-populated
TA 27	TOTAL \$ Amount of Virtual Currency Transactions (in U.S. Dollars)	Auto-populated

NMLS MSB Call Report

SECTION II (b): STATE TRANSACTIONS DETAIL⁶

⁶ State level transaction information only required to be completed in states that adopt 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.

STATE TRANSACTIONS DETAIL

MONEY TRANSMISSION		
ST 1	# of transactions from in-state to U.S. states and territories	
ST 2	\$ amount received for transmission (outbound) from in-state to U.S. states and territories	
ST 3	# of transmission transactions from in-state to Foreign Countries	
ST 4	\$ amount received for transmission (outbound) from in-state to Foreign Countries	
ST 5	TOTAL # of Money Transmission Transactions initiated in-state	Auto-populated
ST 6	TOTAL \$ Amount of Money Transmission Transactions initiated in-state	Auto-populated
PAYMENT INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)		
ST 7	# of payment instruments issued/sold in-state	
ST 8	\$ amounts of payment instruments issued/sold in-state	
STORED VALUE		
ST 9	# of stored value transactions in-state	
ST 10	\$ amount of stored value transactions in-state	
CHECK CASHING		
ST 11	# of checks cashed in-state	
ST 12	\$ amount of checks cashed in-state	
ST 13	\$ amount of fees collected in-state	
ST 14	Maximum percentage charged for check in-state	
FIAT CURRENCY EXCHANGE		
ST 15	# of currency transactions completed in-state	
ST 16	\$ amount of currency transactions completed in-state	
ST 17	\$ amount of fees collected in-state	
VIRTUAL CURRENCY		
ST 18	# of Virtual Currency to Virtual Currency Transactions Initiated In-State	
ST 19	\$ amount of Virtual Currency to Virtual Currency Transactions Initiated In-State	
ST 20	# of Virtual Currency to U.S. Dollar Transactions Initiated In-State	
ST 21	\$ amount of Virtual Currency to U.S. Dollar Transactions Initiated In-State	
ST 22	# of U.S. Dollar to Virtual Currency Transactions Initiated In-State	
ST 23	\$ amount of U.S. Dollar to Virtual Currency Transactions Initiated In-State	
ST 24	Total # of Virtual Currency Exchange Transactions Involving In-State Party	
ST 25	Total \$ amount of Virtual Currency Exchange Transactions Involving In-State Party	
ST 26	TOTAL # of Virtual Currency Transactions Initiated In-State	Auto-populated
ST 27	TOTAL \$ Amount of Virtual Currency Transactions Initiated In-State	Auto-populated

NMLS MSB Call Report

SECTION III: PERMISSIBLE INVESTMENTS REPORT⁷

⁷Reported 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 REPORT

MONEY TRANSMISSION, STORED VALUE, PAYMENT INSTRUMENTS		
PI 1	Deposits in Domestic Banks	
PI 2	Deposits in Foreign Banks	
PI 3	Cash on Hand and in Transit	
PI 4	Total Cash on Hand and in Bank	Auto-populated
PI 5	Irrevocable Letter of Credit	
PI 6	Due from agents (net of allowance for doubtful accounts)	
PI 7	Investments rated A or its equivalent and above	
PI 8	Investments rated BBB or its equivalent and lower or non-rated	
PI 9	Investments in U.S. Treasury securities	
PI 10	Other Investments	
PI 11	Amount pledged or restricted	

MONEY TRANSMISSION		
PI 12	Total Outstanding Transmission Liability	
PI 13	Total Average Daily Outstanding Transmission Liability (ADTL)	

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

NMLS MSB Call Report

**SECTION IV (a): COMPANY-WIDE TRANSACTIONS
DESTINATION COUNTRY DETAIL⁸**

⁸Submitted on annual basis as part of Q4 NMLS MSB Call Report submission. NMLS intends to use Geopolitical Entities, Names, and Codes (GENC) Standard two-letter code format to facilitate destination country reporting. GENC is the replacement standard for FIPS 10-4 and is the U.S. Government profile of the ISO 3166 international country code standard.

COMPANY-WIDE TRANSACTIONS DESTINATION COUNTRY DETAIL (SUBMITTED IN Q4 REPORT ONLY)

TRANSACTION DESTINATION COUNTRY INFORMATION		\$ Amount	# of Transactions
TD	List of Countries Transmitted to During Calendar Year (new line added for each country)		
TOTAL \$ Amount of All Foreign Transmission Transactions		Auto-populated	Auto-populated

Countries Available for Entry (updated as needed)				
Afghanistan	Cook Islands	Iran	Nauru	Spain
Albania	Costa Rica	Iraq	Nepal	Sri Lanka
Algeria	Cote De Ivoire (Ivory Coast)	Ireland	Netherlands	Sudan
American Samoa	Croatia	Isle of Man	Netherlands Antilles	Surinam
Andorra	Cuba	Israel	New Caledonia	Svalbard
Angola	Cyprus	Italy	New Zealand	Swaziland
Anguilla	Czech Republic	Jamaica	Nicaragua	Sweden
Antigua and Barbuda	Denmark	Japan	Niger	Switzerland
Argentina	Djibouti	Jersey	Nigeria	Syria
Armenia	Dominica	Jordan	Niue	Taiwan, Republic of China
Aruba	Dominican Republic	Kazakhstan	Norfolk Island	Tajikistan
Australia	East Timor	Kenya	Northern Mariana Islands	Tanzania
Austria	Ecuador	Kiribati	Norway	Thailand
Azerbaijan	Egypt (United Arab Republic)	Korea, North	Oman	Togo
Bahamas, The	El Salvador	Korea, South	Pakistan	Tokelau
Bahrain	Equatorial Guinea	Kuwait	Palau	Tonga
Bangladesh	Eritrea	Kyrgyzstan	Panama	Trinidad and Tobago
Barbados	Estonia	Laos	Papua New Guinea	Tunisia
Belarus	Ethiopia	Latvia	Paraguay	Turkey
Belgium	Falkland Islands (Islas Malvinas)	Lebanon	Peru	Turkmenistan
Belize	Faroe Islands	Lesotho	Philippines	Turks and Caicos Islands
Benin	Fiji Islands	Liberia	Pitcairn Islands (Ducie, Henderson, Oeno)	Tuvalu
Bermuda	Finland	Libya	Poland	Uganda
Bhutan	France	Liechtenstein	Portugal	Ukraine
Bolivia	French Guiana	Lithuania	Qatar	United Arab Emirates
Bosnia and Herzegovina	French Polynesia	Luxembourg	Reunion	United Kingdom
Botswana	Gabon	Macau	Romania	United States
Brazil	Gambia	Macedonia	Russia	Uruguay
British Virgin Islands	Georgia/Gruzinskaya	Madagascar	Rwanda	US Virgin Islands
Brunei	Germany	Malawi	Saint Helena	Uzbekistan
Bulgaria	Ghana	Malaysia	Saint Kitts and Nevis	Vanuatu
Burkina Faso	Gibraltar	Maldives	Saint Lucia	Venezuela
Burma (Myanmar)	Greece	Mali	Saint Pierre and Miquelon	Vietnam
Burundi	Greenland	Malta	Saint Vincent and the Grenadines	Wallis and Futuna
Cambodia	Grenada	Marshall Islands	Samoa	Western Sahara
Cameroon	Guadeloupe	Martinique	San Marino	Yemen
Canada	Guatemala	Mauritania	Sao Tome and Principe	Zambia
Cape Verde Islands	Guernsey	Mauritius	Saudi Arabia	Zimbabwe
Cayman Islands	Guinea	Mayotte	Senegal	
Central African Republic	Guinea Bissau	Mexico	Serbia and Montenegro	
Chad	Guyana	Micronesia, Federated States	Seychelles	
Chile	Haiti	Moldova	Sierra Leone	
China	Holy See, Vatican City	Monaco	Singapore	
Christmas Island	Honduras	Mongolia	Slovakia	
Cocos (Keeling) Islands	Hong Kong	Montenegro	Slovenia	
Colombia	Hungary	Monteserrat	Solomon Islands	
Comoros	Iceland	Morocco	Somalia	
Congo (Democratic Republic Or Zaire)	India	Mozambique	South Africa	
Congo, Republic of	Indonesia	Namibia	South Georgia/South Sandwich Islands	

NMLS MSB Call Report

SECTION IV (b): STATE TRANSACTIONS DESTINATION COUNTRY DETAIL⁹

⁹Section submitted on annual basis as part of Q4 NMLS MSB Call Report submission. Only submitted in states that adopt the report and choose to permit submission of transaction destination country information through NMLS. NMLS intends to use Geopolitical Entities, Names, and Codes (GENC) Standard two-letter code format to facilitate destination country reporting. GENC is the replacement standard for FIPS 10-4 and is the U.S. Government profile of the ISO 3166 international country code standard.

STATE TRANSACTIONS DESTINATION COUNTRY DETAIL (SUBMITTED IN Q4 REPORT ONLY)

TRANSACTION DESTINATION COUNTRY INFORMATION		\$ Amount	# of Transactions
TD	List of Countries Transmitted to During Calendar Year (new line added for each country)		
TOTAL \$ Amount of All Foreign Transmission Transactions		Auto-populated	Auto-populated

Countries Available for Entry (updated as needed)				
Afghanistan	Cook Islands	Iran	Nauru	Spain
Albania	Costa Rica	Iraq	Nepal	Sri Lanka
Algeria	Cote De Ivoire (Ivory Coast)	Ireland	Netherlands	Sudan
American Samoa	Croatia	Isle of Man	Netherlands Antilles	Surinam
Andorra	Cuba	Israel	New Caledonia	Svalbard
Angola	Cyprus	Italy	New Zealand	Swaziland
Anguilla	Czech Republic	Jamaica	Nicaragua	Sweden
Antigua and Barbuda	Denmark	Japan	Niger	Switzerland
Argentina	Djibouti	Jersey	Nigeria	Syria
Armenia	Dominica	Jordan	Niue	Taiwan, Republic of China
Aruba	Dominican Republic	Kazakhstan	Norfolk Island	Tajikistan
Australia	East Timor	Kenya	Northern Mariana Islands	Tanzania
Austria	Ecuador	Kiribati	Norway	Thailand
Azerbaijan	Egypt (United Arab Republic)	Korea, North	Oman	Togo
Bahamas, The	El Salvador	Korea, South	Pakistan	Tokelau
Bahrain	Equatorial Guinea	Kuwait	Palau	Tonga
Bangladesh	Eritrea	Kyrgyzstan	Panama	Trinidad and Tobago
Barbados	Estonia	Laos	Papua New Guinea	Tunisia
Belarus	Ethiopia	Latvia	Paraguay	Turkey
Belgium	Falkland Islands (Islas Malvinas)	Lebanon	Peru	Turkmenistan
Belize	Faroe Islands	Lesotho	Philippines	Turks and Caicos Islands
Benin	Fiji Islands	Liberia	Pitcairn Islands (Ducie, Henderson, Oeno)	Tuvalu
Bermuda	Finland	Libya	Poland	Uganda
Bhutan	France	Liechtenstein	Portugal	Ukraine
Bolivia	French Guiana	Lithuania	Qatar	United Arab Emirates
Bosnia and Herzegovina	French Polynesia	Luxembourg	Reunion	United Kingdom
Botswana	Gabon	Macau	Romania	United States
Brazil	Gambia	Macedonia	Russia	Uruguay
British Virgin Islands	Georgia/Gruzinskaya	Madagascar	Rwanda	US Virgin Islands
Brunei	Germany	Malawi	Saint Helena	Uzbekistan
Bulgaria	Ghana	Malaysia	Saint Kitts and Nevis	Vanuatu
Burkina Faso	Gibraltar	Maldives	Saint Lucia	Venezuela
Burma (Myanmar)	Greece	Mali	Saint Pierre and Miquelon	Vietnam
Burundi	Greenland	Malta	Saint Vincent and the Grenadines	Wallis and Futuna
Cambodia	Grenada	Marshall Islands	Samoa	Western Sahara
Cameroon	Guadeloupe	Martinique	San Marino	Yemen
Canada	Guatemala	Mauritania	Sao Tome and Principe	Zambia
Cape Verde Islands	Guernsey	Mauritius	Saudi Arabia	Zimbabwe
Cayman Islands	Guinea	Mayotte	Senegal	
Central African Republic	Guinea Bissau	Mexico	Serbia and Montenegro	
Chad	Guyana	Micronesia, Federated States	Seychelles	
Chile	Haiti	Moldova	Sierra Leone	
China	Holy See, Vatican City	Monaco	Singapore	
Christmas Island	Honduras	Mongolia	Slovakia	
Cocos (Keeling) Islands	Hong Kong	Montenegro	Slovenia	
Colombia	Hungary	Monteserrat	Solomon Islands	
Comoros	Iceland	Morocco	Somalia	
Congo (Democratic Republic Or Zaire)	India	Mozambique	South Africa	
Congo, Republic of	Indonesia	Namibia	South Georgia/South Sandwich Islands	

NMLS MSB CALL REPORT FIELD DEFINITIONS

FINANCIAL CONDITION REPORT

ASSETS		
FC1	Cash on Hand and in Bank	Include cash on hand, cash in transit, checks, drafts, ACH credits in the process of clearing, certificates of deposit (CDs), and demand and time balances of accounts at federally insured financial institutions in 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 beneficiaries.
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 be 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.
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. The U.S. Dollar exchange rate must represent a generally accepted and recognized quoted price in the active market for the virtual currency. A blended index should be used if available.
FC10	Other current assets (Detail in section TBD if amount exceeds 20% of current assets total)	Include other assets expected to be realized in cash, sold or consumed during the next year, i.e., inventory, prepaid, etc. Detail in section TBD if amount exceeds 20% of current assets 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 overall assets total)	Report all other assets not included above. Detail in section TBD if amount exceeds 20% of overall assets total.
FC16	TOTAL ASSETS	Sum of lines FC11 through FC15

LIABILITIES 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.
FC21	Outstanding payment instruments	Report licensee's total amount of outstanding payment instruments (including money orders, and travelers' checks) issued on behalf of others and not yet paid to beneficiaries or negotiated. This amount should include all outstanding payment instrument liability.
FC22	Outstanding stored value	Report licensee's total amount of outstanding stored value. This amount should include all outstanding stored value liability.
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. The U.S. Dollar exchange rate must represent a generally accepted and recognized quoted price in the active market for the virtual currency. A blended index should be used if available.
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
SHAREHOLDERS' 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 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.
FC32	Number of 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 income reported in <i>Other comprehensive income</i> .
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 holding gains (losses) on available for sale securities, accumulated net gains (losses) on cash flow hedges, and minimum pension liability adjustments.
FC38	Shareholder distribution	Include dividends declared and paid.
FC39	TOTAL SHAREHOLDERS' EQUITY	Sum of lines FC35 through FC38
FC40	TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	Sum of lines FC28 and FC39

INCOME STATEMENT		
REVENUES		
FC41	Fee income from money received for transmission	Dollar amount of fee income from money received for money transmission. Include fees, service charges and commissions for money transmission only.
FC42	Fee income from sale issuance of payments instruments	Dollar amount of fee income from sale issuance of payment instruments. Include fees, service charges and commissions for payment instruments only.
FC43	Fee income from sale issuance of stored value	Dollar amount of fee income from sale issuance of stored value. Include fees, 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 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, 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 financial institutions and interest on investments including government securities.
FC47	Foreign exchange gains or losses	This is the earnings or loss incurred from buying and selling foreign currency connected with the licensee's business. It is the difference between the cost and the gain/loss of foreign exchange in converting a transaction to the currency of the 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.
FC48	Other income (Detail in section TBD if amount exceeds 20% of total)	All income not included in above. Detail in section TBD if amount exceeds 20% of total.
FC49	TOTAL REVENUE	Sum of lines FC41 through FC48
EXPENSES		
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 and international).
FC52	Rent	Expenses for the use of premises, equipment, furniture and fixtures, janitorial services, utilities, etc.
FC53	Interest expense	Include interest on deposits, mortgages, capital notes, borrowings from financial institutions and obligations on capitalized leases. Do not include interest on borrowings from principals, parent companies, subsidiaries or affiliates (Report this under <i>Other Expenses</i>).
FC54	Depreciation and amortization	Expenses related to the write-off of non-earning assets in accordance with generally acceptable accounting principles (GAAP).
FC55	Communication expense	Expenses related to telephone, facsimile, telegram, postage, and other related expenses.
FC56	Professional services expense	Expenses related to legal, accounting, consulting, examination fees, and other related expenses.
FC57	Marketing and promotion	Expenses related to advertising and the selling of goods and services.
FC58	Insurance expense	Premium expense for fidelity insurance, surety bond, directors' and officers' liability insurance and life insurance policies for which the licensee is the beneficiary.
FC59	Other expenses (Detail in section TBD if amount exceeds 20% of total)	Report all other operating expenses not included above. Detail in section TBD if amount exceeds 20% of total.
FC60	TOTAL EXPENSES	Sum of lines FC50 through FC59
FC61	Income from Continuing Operations before Income Tax	FC49 minus FC60
FC62	Income tax	Federal and state income tax on line FC61
FC63	Income from continuing operations	FC61 minus FC62
FC64	Discontinued operations, Net of tax effect	Income or (loss) from the sale of a segment of the business.
FC65	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 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.
FC66	Income before extraordinary items	Sum of lines FC63 through FC65
FC67	Extraordinary items, net of tax effect	Material, unusual, nonrecurring or infrequent items.
FC68	Net Income (loss)	Sum of lines FC66 and FC67

COMPANY-WIDE TRANSACTIONS DETAIL

MONEY TRANSMISSION		
TA 1	Total # of transactions from U.S. states and territories to U.S. states and territories	Report the total number of transactions from U.S. states and territories to U.S. states and territories in the quarter.
TA 2	Total \$ amount received for transmission from U.S. states and territories to U.S. states and territories	Report the total dollar amount of transactions from U.S. states and territories to U.S. states and territories in the quarter.
TA 3	Total # of transactions from U.S. states and territories to foreign countries	Report the total number of transactions from U.S. States and territories to foreign countries in the quarter.
TA 4	Total \$ amount received for transmission from U.S. states and territories to foreign countries	Report the total dollar amount of transactions from U.S. States and territories to be sent to foreign countries in the quarter.
TA 5	TOTAL # of All Money Transmission Transactions	The total # of Transmission Transactions for the quarter is automatically calculated.
TA 6	TOTAL \$ Amount of All Money Transmission Transactions	The total \$ Amount of Transmission Transactions for the quarter is automatically calculated.
PAYMENT INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)		
TA 7	Total # of payment instruments issued/sold	Report total number of payment instruments sold in the quarter.
TA 8	Total \$ amount of payment instruments issued/sold	Report total dollar amount of payment instruments sold in the quarter.
STORED VALUE		
TA 9	Total # of stored value transactions	Report total number of stored value instruments transactions (issued/sold, etc.) in the quarter. Includes reloads. Does not include withdrawals.
TA 10	Total \$ amount of stored value transactions	Report total dollar amount of stored value transactions (issued/sold, etc.) in the quarter. Includes reloads. Does not include withdrawals.
CHECK CASHING		
TA 11	# of checks cashed	Report total number of checks cashed during the quarter.
TA 12	\$ amount of checks cashed	Report total dollar amount of checks cashed during the quarter.
TA 13	\$ amount of fees collected	Report total dollar amount of fees collected in the quarter.
TA 14	Maximum percentage charged for check	Report the maximum percentage charged for a check during the quarter.
FIAT CURRENCY EXCHANGE		
TA 15	# of currency transactions completed	Report total number of currency exchange transactions during the quarter.
TA 16	\$ amount of currency transactions completed	Report total U.S. dollar amount of currency transactions during the quarter.
TA 17	\$ amount of fees collected	Report total dollar amount of fees collected in the quarter.
VIRTUAL CURRENCY		
TA 18	Total # of Virtual Currency to Virtual Currency Transactions	Report total number of virtual currency to virtual currency transactions completed during the quarter.
TA 19	Total \$ amount of Virtual Currency to Virtual Currency Transactions	Report total dollar amount of virtual currency to virtual currency transactions completed during the quarter (in U.S. Dollars).
TA 20	Total # of Virtual Currency to U.S. Dollar Transactions	Report total number of virtual currency to U.S. Dollar transactions completed during the quarter. This shall only include transactions where the reporting entity is a party in the transaction.
TA 21	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). This shall only include transactions where the reporting entity is a party in the transaction.
TA 22	Total # of U.S. Dollar to Virtual Currency Transactions	Report total number of U.S. Dollar to virtual currency transactions completed during the quarter. This shall only include transactions where the reporting entity is a party in the transaction.
TA 23	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). This shall only include transactions where the reporting entity is a party in the transaction.
TA 24	Total # of Virtual Currency Exchange Transactions	Report total number of virtual currency exchange transactions completed involving a buyer and seller of virtual currency. This shall not include transactions where the entity reporting is the buyer or seller.
TA 25	Total \$ amount of Virtual Currency Exchange Transactions	Report total dollar amount of virtual currency exchange transactions completed involving a buyer and seller of virtual currency (in U.S. Dollars). This shall not include transactions where the entity reporting is the buyer or seller.
TA 26	TOTAL # of Virtual Currency Transactions	The total # of transactions for the quarter is automatically calculated.
TA 27	TOTAL \$ Amount of Virtual Currency Transactions (in U.S. Dollars)	The total \$ Amount of all transactions for the quarter is automatically calculated.

STATE TRANSACTIONS DETAIL

MONEY TRANSMISSION		
ST 1	# of transactions from in-state to U.S. states and territories	Report the total number of transactions from in-state to foreign countries in the quarter.
ST 2	\$ amount received for transmission (outbound) from in-state to U.S. states and territories	Report the total dollar amount of transactions from in-state to be sent to foreign countries in the quarter.
ST 3	# of transmission transactions from in-state to Foreign Countries	Report the total number of transactions from in-state to be sent to a state or territory of the United States in the quarter (includes in-state to in-state transactions).
ST 4	\$ amount received for transmission (outbound) from in-state to Foreign Countries	Report the total dollar amount of transactions from in-state to be sent to a state or territory of the United States in the quarter (includes in-state to in-state transactions).
ST 5	TOTAL # of Money Transmission Transactions initiated in-state	The total # of All In-State Transmission Transactions for the quarter is automatically calculated.
ST 6	TOTAL \$ Amount of Money Transmission Transactions initiated in-state	The total \$ Amount of All In-State Transmission Transactions for the quarter is automatically calculated.
PAYMENT INSTRUMENTS (MONEY ORDERS, TRAVELERS CHECKS, DRAFTS)		
ST 7	# of payment instruments issued/sold in-state	Report total number of payment instruments sold in-state during the quarter.
ST 8	\$ amounts of payment instruments issued/sold in-state	Report total dollar amount of payment instruments sold in-state during the quarter.
STORED VALUE		
ST 9	# of stored value transactions in-state	Report total number of stored value instruments sold/issued in-state during the quarter. Includes reloads. Does not include withdrawals.
ST 10	\$ amount of stored value transactions in-state	Report total dollar amount of stored value sold/issued in-state during the quarter. Includes reloads. Does not include withdrawals.
CHECK CASHING		
ST 11	# of checks cashed in-state	Report total number of checks cashed in-state during the quarter.
ST 12	\$ amount of checks cashed in-state	Report total dollar amount of checks cashed in-state during the quarter.
ST 13	\$ amount of fees collected in-state	Report total dollar amount of fees collected in-state in the quarter.
ST 14	Maximum percentage charged for check in-state	Report the maximum percentage charged for a check in-state during the quarter.
FIAT CURRENCY EXCHANGE		
ST 15	# of currency transactions completed in-state	Report total number of currency exchange transactions during the quarter.
ST 16	\$ amount of currency transactions completed in-state	Report total U.S. dollar amount of currency transactions in-state during the quarter.
ST 17	\$ amount of fees collected in-state	Report total dollar amount of fees collected in-state in the quarter.
VIRTUAL CURRENCY		
ST 18	# of Virtual Currency to Virtual Currency Transactions Initiated In-State	Report total number of virtual currency to virtual currency transactions initiated in-state during the quarter.
ST 19	\$ amount of Virtual Currency to Virtual Currency Transactions Initiated In-State	Report total dollar amount of virtual currency to virtual currency transactions initiated in-state during the quarter (in U.S. Dollars).
ST 20	# of Virtual Currency to U.S. Dollar Transactions Initiated In-State	Report total number of virtual currency to U.S. Dollar transactions initiated in-state during the quarter. This shall only include transactions where the reporting entity is a party in the transaction.
ST 21	\$ amount of Virtual Currency to U.S. Dollar Transactions Initiated In-State	Report total dollar amount of virtual currency to U.S. Dollar transactions initiated in-state during the quarter (in U.S. Dollars). This shall only include transactions where the reporting entity is a party in the transaction.
ST 22	# of U.S. Dollar to Virtual Currency Transactions Initiated In-State	Report total number of U.S. Dollar to virtual currency transactions initiated in-state during the quarter. This shall only include transactions where the reporting entity is a party in the transaction.
ST 23	\$ amount of U.S. Dollar to Virtual Currency Transactions Initiated In-State	Report total dollar amount of U.S. Dollar to virtual currency transactions initiated in-state during the quarter (in U.S. Dollars). This shall only include transactions where the reporting entity is a party in the transaction.
ST 24	Total # of Virtual Currency Exchange Transactions Involving In-State Party	Report total number of virtual currency exchange transactions completed involving a in-state located buyer and/or seller of virtual currency. This shall not include transactions where the entity reporting is the buyer or seller.
ST 25	Total \$ amount of Virtual Currency Exchange Transactions Involving In-State Party	Report total dollar amount of virtual currency exchange transactions completed involving an in-state located buyer and/or seller of virtual currency (in U.S. Dollars). This shall not include transactions where the entity reporting is the buyer or seller.
ST 26	TOTAL # of Virtual Currency Transactions Initiated In-State	The total # of in-state transactions for the quarter is automatically calculated.
ST 27	TOTAL \$ Amount of Virtual Currency Transactions Initiated In-State	The total \$ Amount of in-state transactions for the quarter is automatically calculated.

PERMISSIBLE INVESTMENTS REPORT

MONEY TRANSMISSION, STORED VALUE, PAYMENT INSTRUMENTS

PI 1	Deposits in Domestic Banks	Cash, time deposits, savings deposits, demand deposits, a certificate of deposit, or senior debt obligation of accounts at federally insured financial institutions in the United States as defined in section 3 of the federal Deposit Insurance Act (12 U.S.C. Sec. 1813) or as defined under the federal Credit Union Act (12 U.S.C. Sec. 1781).
PI 2	Deposits in Foreign Banks	Cash, time deposits, savings deposits, demand deposits, a certificate of deposit, or senior debt obligation of accounts in foreign banks.
PI 3	Cash on Hand and in Transit	Include cash on hand, cash in transit, checks, drafts.
PI 4	Total Cash on Hand and in Bank	Sum of lines PI 1 through PI 3
PI 5	Irrevocable Letter of Credit	Report amount of irrevocable letters of credit issued by a federally insured financial institution.
PI 6	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 beneficiaries.
PI 7	Investments rated A or its 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.
PI 8	Investments rated BBB or its 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.
PI 9	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).
PI 10	Other Investments	Report all other investments not included above. Detail in section TBD if amount exceeds 20% of total.
PI 11	Amount pledged or restricted	Report the amount pledged or restricted.

MONEY TRANSMISSION (ADD'L SECTION FOR MT LICENSEES)

PI 12	Total Outstanding 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.
PI 13	Total Average Daily Outstanding Transmission Liability (ADTL)	Report the average daily transmission liability ("ADTL") for the quarter.

VIRTUAL CURRENCY (ADD'L SECTION FOR VC LICENSEES)

PI 14	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. The U.S. Dollar exchange rate must represent a generally accepted and recognized quoted price in the active market for the virtual currency. A blended index should be used if available.
PI 15	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. The U.S. Dollar exchange rate must represent a generally accepted and recognized quoted price in the active market for the virtual currency. A blended index should be used if available.
PI 16	Other Investments (in U.S. Dollars)	Report all other virtual currency investments not included above. Detail in section TBD if amount exceeds 20% of total. The U.S. Dollar exchange rate must represent a generally accepted and recognized quoted price in the active market for the virtual currency. A blended index should be used if available.
PI 17	Total VC coverage	Sum of lines PI 14 through PI 16
PI 18	Outstanding Virtual Currency Liability	Automatically populated with amount entered in FC23.

COMPANY-WIDE TRANSACTIONS DESTINATION COUNTRY DETAIL

TRANSACTION DESTINATION COUNTRY INFORMATION

TD	List of Countries Transmitted to During Calendar Year (new line added for each country)	Report the number of transactions and the actual dollar amount in the calendar year of transmission money received to be sent to each country included in the schedule. All countries transmitted to during the calendar year should be included in the submission. This section shall only be submitted as part of the Q4 report submission.
----	---	---

Countries Available for Entry (updated as needed)				
Afghanistan	Cook Islands	Iran	Nauru	Spain
Albania	Costa Rica	Iraq	Nepal	Sri Lanka
Algeria	Cote D'Ivoire (Ivory Coast)	Ireland	Netherlands	Sudan
American Samoa	Croatia	Isle of Man	Netherlands Antilles	Surinam
Andorra	Cuba	Israel	New Caledonia	Svalbard
Angola	Cyprus	Italy	New Zealand	Swaziland
Anguilla	Czech Republic	Jamaica	Nicaragua	Sweden
Antigua and Barbuda	Denmark	Japan	Niger	Switzerland
Argentina	Djibouti	Jersey	Nigeria	Syria
Armenia	Dominica	Jordan	Niue	Taiwan, Republic of China
Aruba	Dominican Republic	Kazakhstan	Norfolk Island	Tajikistan
Australia	East Timor	Kenya	Northern Mariana Islands	Tanzania
Austria	Ecuador	Kiribati	Norway	Thailand
Azerbaijan	Egypt (United Arab Republic)	Korea, North	Oman	Togo
Bahamas, The	El Salvador	Korea, South	Pakistan	Tokelau
Bahrain	Equatorial Guinea	Kuwait	Palau	Tonga
Bangladesh	Eritrea	Kyrgyzstan	Panama	Trinidad and Tobago
Barbados	Estonia	Laos	Papua New Guinea	Tunisia
Belarus	Ethiopia	Latvia	Paraguay	Turkey
Belgium	Falkland Islands (Islas Malvinas)	Lebanon	Peru	Turkmenistan
Belize	Faroe Islands	Lesotho	Philippines	Turks and Caicos Islands
Benin	Fiji Islands	Liberia	Pitcairn Islands (Ducie, Henderson, Oeno)	Tuvalu
Bermuda	Finland	Libya	Poland	Uganda
Bhutan	France	Liechtenstein	Portugal	Ukraine
Bolivia	French Guiana	Lithuania	Qatar	United Arab Emirates
Bosnia and Herzegovina	French Polynesia	Luxembourg	Reunion	United Kingdom
Botswana	Gabon	Macau	Romania	United States
Brazil	Gambia	Macedonia	Russia	Uruguay
British Virgin Islands	Georgia/Gruzinskaya	Madagascar	Rwanda	US Virgin Islands
Brunei	Germany	Malawi	Saint Helena	Uzbekistan
Bulgaria	Ghana	Malaysia	Saint Kitts and Nevis	Vanuatu
Burkina Faso	Gibraltar	Maldives	Saint Lucia	Venezuela
Burma (Myanmar)	Greece	Mali	Saint Pierre and Miquelon	Vietnam
Burundi	Greenland	Malta	Saint Vincent and the Grenadines	Wallis and Futuna
Cambodia	Grenada	Marshall Islands	Samoa	Western Sahara
Cameroon	Guadeloupe	Martinique	San Marino	Yemen
Canada	Guatemala	Mauritania	Sao Tome and Principe	Zambia
Cape Verde Islands	Guernsey	Mauritius	Saudi Arabia	Zimbabwe
Cayman Islands	Guinea	Mayotte	Senegal	
Central African Republic	Guinea Bissau	Mexico	Serbia and Montenegro	
Chad	Guyana	Micronesia, Federated States	Seychelles	
Chile	Haiti	Moldova	Sierra Leone	
China	Holy See, Vatican City	Monaco	Singapore	
Christmas Island	Honduras	Mongolia	Slovakia	
Cocos (Keeling) Islands	Hong Kong	Montenegro	Slovenia	
Colombia	Hungary	Montserrat	Solomon Islands	
Comoros	Iceland	Morocco	Somalia	
Congo (Democratic Republic Or Zaire)	India	Mozambique	South Africa	
Congo, Republic of	Indonesia	Namibia	South Georgia/South Sandwich Islands	

10

¹⁰Country listing to be updated for new additions or when country name changes occur. Related to the bulk upload of the report, all countries will be assigned a code in order for licensees to more easily complete automated uploads.

STATE TRANSACTIONS DESTINATION COUNTRY DETAIL

TRANSACTION DESTINATION COUNTRY INFORMATION

TD	List of Countries Transmitted to During Calendar Year (new line added for each country)	Report the number of transactions and the actual dollar amount in the calendar year of transmission money received in-state to be sent to each country included in the schedule. All countries transmitted to during the calendar year should be included in the submission. This section shall only be submitted as part of the Q4 report submission.
----	---	--

Countries Available for Entry (updated as needed)				
Afghanistan	Cook Islands	Iran	Nauru	Spain
Albania	Costa Rica	Iraq	Nepal	Sri Lanka
Algeria	Cote D'Ivoire (Ivory Coast)	Ireland	Netherlands	Sudan
American Samoa	Croatia	Isle of Man	Netherlands Antilles	Surinam
Andorra	Cuba	Israel	New Caledonia	Svalbard
Angola	Cyprus	Italy	New Zealand	Swaziland
Anguilla	Czech Republic	Jamaica	Nicaragua	Sweden
Antigua and Barbuda	Denmark	Japan	Niger	Switzerland
Argentina	Djibouti	Jersey	Nigeria	Syria
Armenia	Dominica	Jordan	Niue	Taiwan, Republic of China
Aruba	Dominican Republic	Kazakhstan	Norfolk Island	Tajikistan
Australia	East Timor	Kenya	Northern Mariana Islands	Tanzania
Austria	Ecuador	Kiribati	Norway	Thailand
Azerbaijan	Egypt (United Arab Republic)	Korea, North	Oman	Togo
Bahamas, The	El Salvador	Korea, South	Pakistan	Tokelau
Bahrain	Equatorial Guinea	Kuwait	Palau	Tonga
Bangladesh	Eritrea	Kyrgyzstan	Panama	Trinidad and Tobago
Barbados	Estonia	Laos	Papua New Guinea	Tunisia
Belarus	Ethiopia	Latvia	Paraguay	Turkey
Belgium	Falkland Islands (Islas Malvinas)	Lebanon	Peru	Turkmenistan
Belize	Faroe Islands	Lesotho	Philippines	Turks and Caicos Islands
Benin	Fiji Islands	Liberia	Pitcairn Islands (Ducie, Henderson, Oeno)	Tuvalu
Bermuda	Finland	Libya	Poland	Uganda
Bhutan	France	Liechtenstein	Portugal	Ukraine
Bolivia	French Guiana	Lithuania	Qatar	United Arab Emirates
Bosnia and Herzegovina	French Polynesia	Luxembourg	Reunion	United Kingdom
Botswana	Gabon	Macau	Romania	United States
Brazil	Gambia	Macedonia	Russia	Uruguay
British Virgin Islands	Georgia/Gruzinskaya	Madagascar	Rwanda	US Virgin Islands
Brunei	Germany	Malawi	Saint Helena	Uzbekistan
Bulgaria	Ghana	Malaysia	Saint Kitts and Nevis	Vanuatu
Burkina Faso	Gibraltar	Maldives	Saint Lucia	Venezuela
Burma (Myanmar)	Greece	Mali	Saint Pierre and Miquelon	Vietnam
Burundi	Greenland	Malta	Saint Vincent and the Grenadines	Wallis and Futuna
Cambodia	Grenada	Marshall Islands	Samoa	Western Sahara
Cameroon	Guadeloupe	Martinique	San Marino	Yemen
Canada	Guatemala	Mauritania	Sao Tome and Principe	Zambia
Cape Verde Islands	Guernsey	Mauritius	Saudi Arabia	Zimbabwe
Cayman Islands	Guinea	Mayotte	Senegal	
Central African Republic	Guinea Bissau	Mexico	Serbia and Montenegro	
Chad	Guyana	Micronesia, Federated States	Seychelles	
Chile	Haiti	Moldova	Sierra Leone	
China	Holy See, Vatican City	Monaco	Singapore	
Christmas Island	Honduras	Mongolia	Slovakia	
Cocos (Keeling) Islands	Hong Kong	Montenegro	Slovenia	
Colombia	Hungary	Montserrat	Solomon Islands	
Comoros	Iceland	Morocco	Somalia	
Congo (Democratic Republic Or Zaire)	India	Mozambique	South Africa	
Congo, Republic of	Indonesia	Namibia	South Georgia/South Sandwich Islands	

11

¹¹Country listing to be updated for new additions or when country name changes occur. Related to the bulk upload of the report, all countries will be assigned a code in order for licensees to more easily complete automated uploads.