

February 6, 2012

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Hon. Ruth Teichman
Chair, Senate Financial Institutions and
Insurance Committee
Kansas State Capitol
300 SW 10th Street
Topeka, KS 66612

Re: TESTIMONY OF THE MONEY SERVICES ROUND TABLE IN SUPPORT OF
SB 64, SECTION 1, AS AMENDED

Dear Chair Teichman:

These comments are submitted on behalf of the Money Services Round Table ("TMRST"), which is the organization of the large, national non-bank money transmitters, including Western Union, MoneyGram, RIA SIGUE, American Express and Integrated Payment Systems. These companies are licensed under the Kansas money transmitter law, K.S.A. 9-508, et seq. TMSRT submits these comments in support of section 1, as amended, of SB 64.

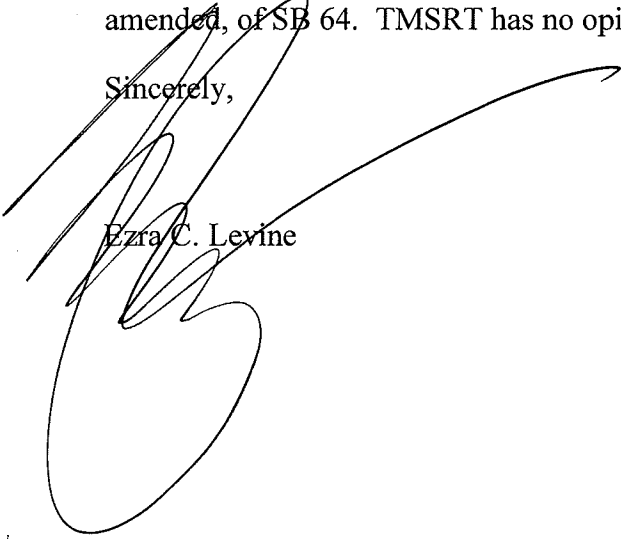
Section 1, as amended, of SB 64 would amend the transmitters law at K.S.A. 9-509 to allow the state bank commissioner, in the administration of the licensing law for non-bank money transmitters to require, as a condition of licensing, that officers and directors, etc. of license applicants provide fingerprints. These fingerprints will be submitted by the Department to the Federal Bureau of Investigation, or other law enforcement agency, so that criminal checks of key individuals can be performed.

Many states with money transmitter laws require fingerprinting of officers, directors, etc. of non-publicly traded corporations. Therefore TMSRT does not oppose adoption of such a requirement in Kansas. It should be noted that virtually all states do not require fingerprinting of officers, directors, etc. of publicly traded corporations and their subsidiaries, since personal background information including, but not limited to, information regarding criminal background is submitted to and reviewed by the U.S. Securities and Exchange Commission. Therefore, there is no need in such cases to duplicate the process, with the attendant costs to both the regulator and the regulated entities.

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In sum, TMSRT respectfully requests that the Committee vote favorably on section 1, as amended, of SB 64. TMSRT has no opinion on the other sections of SB 64.

Sincerely,



Ezra C. Levine