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February 7, 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 372

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 SB 372.

SB 372 would amend the transmitters law at K.S.A. 9-508 for various purposes, and contains fine-tuning provisions to the existing transmitters law. Among other things, the bill would: refine and clarify the permissible investment categories; clarify the basis for assessment of application fees; make clear that banks, governmental entities and others are exempt from the act; provide authority for the banking department to sanction those violating the act or seek injunctive relief; and provide the administrative procedures and basis for denial, revocation or suspension of licenses in specific circumstances.

On balance, these proposed amendments to the existing transmitters law provide a needed update consistent with provisions in transmitter licensing laws in other states. TMSRT believes that these changes, particularly those that deal with additional powers for the department to take action against those that violate the law, are necessary to protect the public interest.

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For these reasons, TMSRT respectfully recommends that the bill receive favorable consideration by the Committee. Finally, TMSRT would like to make special mention of its appreciation for the efforts of Judi Stork and Diane Bellquist of the Office of the State Bank Commissioner to engage with the regulated industry to ensure that the bill will not cause undue burdens or disruptions in established industry procedures.

Sincerely,



Ezra C. Levine