

# Comments Requested (Round 2): MSB Model Law



As part of CSBS’s Vision 2020, state regulators have committed to adopting an integrated, 50-state licensing and supervisory system that recognizes standards across state lines. One of the primary areas for Vision 2020 is state regulation of money services businesses. Last year, CSBS requested comment on MSB model law language focused on four issue areas identified by the Fintech Industry Advisory Panel – Control, Activity and Exemption Definitions, Safety & Soundness, and Supervision.

To finalize the areas of Control and Supervision, CSBS seeks a second round of comments on updates based on the 2019 comments. Because the language is narrowed to less controversial issues and mostly adopted from industry comments, CSBS requests all comments by COB Wednesday, March 11th. Comments will be made available on this page after the comment period closes.

[Access Request for Comments](#)

# Comments Submitted

Company	Comment Letter Link
Blackhawk	<a href="#">Link [PDF]</a>
Electronic Transactions Association	<a href="#">Link [PDF]</a>
Financial Innovation Now	<a href="#">Link [PDF]</a>
Hunton Andrews Kurth	<a href="#">Link [PDF]</a>
Mastercard	<a href="#">Link [PDF]</a>
Mezu (N.A.), Inc.	<a href="#">Link [PDF]</a>
Morrison Foerster	<a href="#">Link [PDF]</a>

Company	Comment Letter Link
National Consumer Law Center/Consumer Reports	<a href="#">Link [PDF]</a>
Netchex	<a href="#">Link [PDF]</a>
Third Party Payment Processors Association	<a href="#">Link [PDF]</a>
Transferwise	<a href="#">Link [PDF]</a>
Remitly	<a href="#">Link [PDF]</a>

## Due Date

Comments were requested on the Draft Model Law Language for MSBs by **March 11, 2020**.

## Documents

The materials for public consideration are as follows:

- [Executive Summary](#)
- [Model Law Language Chart](#)
- Policy & Statutory Language Overview Templates:
  - [Activities & Exemption](#)
  - [Control](#)
  - [Financial Condition](#)
- [Alternative Financial Condition Proposal: Suspension Bridge](#)

## Contact Information

For questions, please email [modelepaymentslaw@csbs.org](mailto:modelepaymentslaw@csbs.org).