

December 4, 2011

Office of Regulatory Policy and Programs Division,
Financial Crimes Enforcement Network,
Department of the Treasury,
P.O. Box 39
Vienna, VA 22183

Attn: PRA Comments--MSB Registration--Form 107

Re: PRA Comments--MSB Registration--Form 107

Dear Ladies and Gentlemen:

This letter is submitted to the Office of Regulatory Policy and Programs Division ("Division") on behalf of InteliSpend Prepaid Solutions, LLC ("InteliSpend") in response to the proposed information collection requirements contained in Registration of Money Services Business, FinCEN Form 107, with request for comment published in the Federal Register on October 6, 2011, at 76 Fed. Reg. 62149-62164 ("Proposed Form").

InteliSpend believes the Proposed Form generally responds to the information collection requirements imposed on money service businesses ("MSBs") by the new prepaid access program regulations. However, InteliSpend agrees that there may be unclear instruction with regard to the seven issues identified in the letter dated December 2, 2011 from the Network Branded Prepaid Card Association ("NBPCA").

In particular, regarding Item 38, we would like to reinforce the NBPCA's recommendation of reporting multiple similar programs with a general description. For example, as a provider of business-to-business loyalty, award and promotion cards without cash access ("LAP Cards") we would like to recommend that LAP Cards be able to be described generally as "loyalty/award/promotion programs" or "business-to-business programs" considering the low risk of use for money laundering and criminal purposes and the varying types of programs under one IIN. It is our intention that this recommendation is similar to the general description of "payroll program" by the NBPCA in its comment letter.

Thank you for the opportunity to comment. I am happy to discuss the comments personally at your convenience.

Sincerely,



1400 South Highway Drive, Fenton, MO 63099