



Mary Rupp, Secretary of the Board
National Credit Union Administration
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Proposed Amendments to the NCUA Regulations re: CUSOs 12 CFR Parts 712 and 741

Dear Ms. Rupp,

Maps Service Agency, Inc., serves as the holding company for several subsidiaries that support either the initiatives of Maps Credit Union or are industry suppliers of services to the credit union community.

We find that the proposed rule only adds an additional layer of bureaucracy to an organization that is already highly regulated. What is more concerning to us is that it appears that the NCUA is on a course designed to create full regulatory authority over CUSOs, regardless of existing safeguards and other regulatory entity involvement.

MSA is comprised of six key subsidiary companies or departments, including Maps Insurance Services, LLC., CU Wireless, LLC., Maps Advisory Services, LLC., the CU Insurance Alliance, LLC., Advanced Reporting, and Lending Services. Each of these entities or programs is already regulated or heavily influenced by regulation:

- Maps Insurance Services, LLC. This provider of personal and commercial lines insurance to the Maps membership and local communities that Maps serves is already regulated by the **State of Oregon's Insurance Division.**
- CU Wireless, LLC. This provider of wireless services and mobile banking technologies is already regulated by the **Federal Communications Commission** and must adhere to the regulatory requirements imposed upon its client base.
- Maps Advisory Services, LLC. This investment advisory firm serving the savings needs of Maps members and the institutional needs of several credit unions is already regulated by the **Securities and Exchange Commission.**
- CU Insurance Alliance, LLC. This multi-credit union owned insurance brokerage is already regulated by the Insurance Regulator in every state in which it operates. Currently, this includes the **State of Oregon Insurance Division, Washington State Office of the Insurance Commissioner, State of Iowa Insurance Division, Tennessee Department of Commerce and Insurance and the State of North Carolina Department of Insurance.**
- Advanced Reporting is a provider of pre-employment screens to the credit union industry. As a provider, Advanced Reporting is regulated by the **Federal Trade Commission, Equal Employment**



Opportunity Commission, and will now fall under the additional jurisdiction of the Consumer Financial Protection Bureau.

- Lending Services provides Maps Credit Unions with supplemental products offered in conjunction with the Credit Union's ongoing lending efforts. In some cases, these products are insurance products and therefore subject to regulation by the State of Oregon's Insurance Division. In other instances, the product is designed as an insurance-like product. In all instances, products must fit within the regulatory expectations of the NCUA.

It is important to note that some products, such as Lending Services or Investments, could technically be run through the Maps Credit Union. However, due to the pressures placed on Unrelated Business Income Tax, our organization has taken a conservative position, placing these products through an entity that pays taxes, thereby following the desires of yet another Federal Regulator, the Internal Revenue Service.

Having said all of this, the critical question asked by the Board of Directors of Maps Service Agency is, "to what benefit does an additional layer of regulatory burden provide to our organization?" The downside of additional regulatory burden is obvious:

- Less competitive offerings due to the increased expense affiliated with additional regulatory oversight.
- Less attractive working environment for individuals who are traditionally not exposed to the regulatory situation found in credit unions.
- Additional administrative priority that will require time away from organizational focus on providing return to shareholders.
- And, most importantly, increased opportunity for competitors to steal current employees who are attracted to a less regulated environment. Books of business will migrate in those transitions, weakening the financial underpinnings of our more heavily regulated structures.

In conclusion, it is clear to us that the NCUA already has significant oversight of CUSOs through influence on their investor credit unions and through the accesses already granted to NCUA in earlier regulation.

The MSA Holding Company has provided Maps Credit Union, as its parent company, return on investment (ROI) in excess of 100% eight out of the last ten years (for those years, under 100%, the ROI was in the 25 to 50% range), all while providing the Credit Union with an innovative influence that has made the Maps organization strong in reputation within both the credit union and CUSO communities and strong from a financial performance perspective. Additional regulatory oversight from NCUA will not provide greater value to Maps Credit Union or to MSA as a holding company.

Sincerely,



Tom Marks
Board Chairman
Maps Service Agency, Inc.



Mark A. Zook
President/CEO
Maps Credit Union