

October 31, 2015

OASIS
35 Corporate Drive Suite 150
Burlington, MA 01803-4238

RE: Expansion of Legal Service MDE Position Paper Version 1.0

Thank you for the opportunity to comment on Expansion of Legal Service MDE Position Paper Version 1.0

Established in 1980, **National Corporate Research, Ltd. (NCR)** is a professional/commercial registered agent company that provides statutory representation and process agent services under private contracts for tens of thousands of companies across the country. NCR is qualified to act as registered agent in all 50 states and the District of Columbia. NCR also offers registered agent services in many other countries throughout the world.

As a commercial registered agent, each year, NCR handles thousands of primary and secondary service of process and other legal communications received on behalf of our clients. In addition to being served by process servers, process is received by many other means including regular and certified mail, courier service and in some cases fax and e-mail.

NCR does not have a general comment on the concept of process servers receiving access to court systems through the expansion of the Oasis Legal XML Electronic Court filing system for purposes of facilitating limited service of process. However we would like to make some specific comments on the draft.

1. The terms "service of process," "limited service of process" and "service of process in the first instance" are not clearly delineated. In particular we are concerned about the drafter's use of the words "primary service" in the 3rd objective for the system listed in the introduction. If the drafters intentionally used the words "primary service of process" in the objective, the ability to opt in to receive service of process should be extended to commercial registered agents and other interested parties. Commercial registered agents receive a significant percentage of process related to business disputes, including class action suites. The ability to transmit data directly from the courts to the agents would lead to significant increase in efficiencies.
2. The system should be designed in a way that is does not preclude alternative methods of service on commercial registered agents and others as statutes and court rules evolve. While it is not necessary for

commercial registered agents to have access to the court records, there should be a way for commercial registered agents and other interested parties to receive service and communications directly from the court electronically.

3. The system should not hinder any of the methods by which we currently receive process.

NCR is agnostic on the proposed Legal Service MDE Enhancements for Limited SOP; however, we believe the GetFilingAssemblyProvidersOperations option will be more difficult to maintain.

Thank you again for opportunity to provide input. Please feel free to phone or e-mail me if the committee has any questions or concerns about our comments.

Best Regards



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