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Subject: EGRPRA

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Bank Secrecy Act

The \$10,000 CTR reporting threshold should be increased from \$10,000. The \$10,000 threshold is very burdensome, especially for a small community bank, because it causes excessive numbers of reports to be filed. If the threshold had been indexed to inflation in 1979, the reporting amount now would be \$26,952! Or, put another way, the \$10,000 now is like reporting on \$3,700 in 1979! The threshold should be set at \$25,000 and indexed to inflation every year or three years. Failure to index is a guarantee that the reporting requirement will become burdensome and intrusive over time.

Not only is the \$10,000 very burdensome on those who must submit the reports, it is cluttering up the system with CTRs which undoubtedly have some value, but not enough value to justify the cost and burden of filing, data entry, storage and retrieval.

The \$10,000 threshold for CTRs also has the direct effect of causing Suspicious Activity Reports (SAR) to be filed for structuring transactions in amounts slightly below the \$10,000 threshold. Such to make use of it. Increasing the CTR reporting threshold thus would also directly benefit the SAR system, by reducing the number of "structuring" SARs that are filed, and uncluttering the system.

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