

From: [Robyn R. Wilson](#)
To: [Comments_Regulation](#)
Subject: Attention: BSA-SAR Database
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Valley Bank has the following comments on the proposed SAR form changes:

The PDF and Adobe capability will be an enhancement to the current SAR form. The CTR form works well in Adobe and we feel the SAR form will too.

The ability to attach excel spreadsheets for transactions would be very beneficial since the current SAR format does not allow for this when submitted electronically.

For #7 data field-NAICS code- a drop down listing all of the codes to pick from would be beneficial.

For # 11 and # 66 data fields- Unless this automatically prefills, this could create an added burden on community banks by having to geocode each person on the SAR and finding out if they are in a HIDTA and HIFCA which is a manual process for us today. If automatically prefilled based on the address of the suspects, then that would be more effective and efficient for us and should not cause any additional burden.

For #15 data field- what identification methods should we use if the suspect is a business?

For # 20 data field- need more explanation of what this data field is asking the filer.

For # 25 data field- need more explanation and definitions for Purchaser/Sender and Payee/Receiver

For #28 data field- like the fact that there is a cumulative total for continued activity and a report total. This always had to be explained in the narrative section for continued SAR filings.

For # 29 and # 36-44 data fields– the new additions are more effective and easier to decipher the type of suspicious activity that occurred and the type of product involved. This will tie back to the narrative section and should explain the details of what happened more accurately .

#59 and # 63 data fields- need more explanation of numbers required. # 59 is repeated again in section III.

For # 61 and 68 data fields- need more explanation and definitions for selling and paying locations. Seem repetitive to have them listed for financial institution and then again for branch. For a community bank this would be the same information completed twice.

For #62- like the addition of being able to show several braches. This was much needed since we were spending a lot of time detailing multiple branches and addresses in the narrative.

77 data field- Recommend this field be completed with only the bank name to protect the

confidentiality of the individual filing the SAR on behalf of the bank.

Some of the same items are repeated in sections III and IV. (TIN, Tin Type, Zip code, address, country, internal control file #). Is this necessary to complete this information twice on two consecutive parts of the SAR?

#94-96 data fields- Recommend that no email address be provided based on protecting confidentiality of the individual filing the SAR on behalf of the bank. Office, address and phone number is sufficient.

These enhancements would benefit us in completing the SAR as long as clear definitions, explanations are provided for newly defined fields and drop downs or prefills are provided for the codes. Thank you for your consideration of these SAR comments. Robyn Wilson, VP BSA and Compliance Officer of Valley Bank.