

**From:** [Turner, Brian](#)  
**To:** [Comments\\_Regulation](#)  
**Subject:** Attention: CTR Database  
**Date:** Tuesday, March 29, 2011 4:38:59 PM  
**Attachments:** [Proposed Data Fields for eFiling - Questions-Comments.doc](#)

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Attention: CTR Database,

## **Proposed Data fields for eFiling**

### **Questions/Comments**

#### **Comments:**

1. There is no mention of what the expected country and territory codes will be. It would be great if FinCEN and IRS could agree on one standard set of expected country and territory codes so financial institutions would only need to maintain one set of tables.
  
2. Would it be possible to provide a comment field in Part II [Amount and Type of Transaction(s)] for documenting the “source of funds” or “cause for withdrawal” to help provide the branch tellers with an opportunity to question and document customer’s response in regards to depositing/withdrawing so much cash?

#### **Questions:**

##### **CTR:**

15. TIN (enter number in space provided and check appropriate type below)
  - a. (Check if) unknown
16. TIN Type \*(if 15 is completed)
  - a. EIN
  - b. SSN-ITIN
  - c. Foreign

Question: What is expected in 15 when 16.c. is selected?

Question: Does 15.a count as 15 being completed? If so, would we need to make the assumption in selecting 16.b or 16.c?

##### **DOEP:**

19. RSSD

Question: what is expected here?

Thank you!

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# Proposed Data fields for eFiling

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