

From: [Joanne Joyner](#)  
To: [Comments\\_Regulation](#)  
Subject: Comment for required Efilng  
Date: Wednesday, November 09, 2011 4:16:52 PM

---

**Sirs:**

***While Efilng appears somewhat more efficient but only because it saves postage but not much else, to require this be done would be a mistake. The test process is not a smooth one, the help desk isn't the best help, and there seem to be more mismatches in weird areas. By that I mean I have seen errors telling me that "U.S." is not a country. And correcting a mistake that isn't there is impossible and requires resubmission. The EIN mismatches continue each and every time a file is sent regardless of corrections or denials that there is a mismatch. And if your core processor isn't compatible are serious, expensive upgrades going to have to be completed before the Efilng can begin? I wouldn't begin to estimate the number of banks who don't efile, but if each one has to send 25 tests for CTRs and 25 tests for SARS, I'm not sure that the site would be able to handle the volume nor handle the questions from the banks attempting to file. The whole process really requires about as much work on the bank's end so there would be no savings there. And the increase in personnel to handle the help desk would require doubling the work force at FinCen.***

*Joanne Joyner, VP*

**DISCLAIMER:**

This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. This communication represents the originator's personal views and opinions, which do not necessarily reflect those of Anderson Brothers Bank.. The sender believes that this E-mail and any attachments did not contain a virus, worm, Trojan horse, and/or malicious code when sent. This message and its attachments could have been infected during transmission. By reading the message and opening any attachments, the recipient accepts full responsibility for taking protective and remedial action about viruses and other defects.

If you received this email in error, please immediately notify [joannej@abbank.com](mailto:joannej@abbank.com).