



November 15, 2011

**Via Electronic Mail**

Regulatory Policy and Programs Division  
Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, Virginia 22183  
Attention: PRA Comments—BSA Required Electronic Filing

Re: PRA Comments—BSA Required Electronic Filing

To whom it may concern:

This letter is submitted on behalf of FIS, in response to FinCEN's proposal that electronic filing of certain BSA reports be mandatory. FIS is the world's largest global provider dedicated to banking and payments technologies. With a long history deeply rooted in the financial services sector, FIS serves more than 14,000 institutions in over 100 countries and holds leadership positions in payment processing, banking solutions, and services and outsourcing of the technology that drives financial institutions. FIS appreciates the opportunity to comment and respectfully requests that FinCEN consider the impacts to our business.

**Filer Impact Assessment**

FIS supports the Treasury's paperless initiative and efforts to enhance the quality of electronic data, improve analytic capabilities in supporting law enforcement requirements and reduction in taxpayer costs. However, FIS feels that the burden to third-party service providers who support BSA E-Filing has been underestimated. More specifically, the new BSA E-Filing electronic file format changes recently announced will require significant in-house coding changes for multiple FIS banking products and thousands of development and testing hours. Below are the details of our concerns:

- 1) The increase in various field lengths and collection of new data fields will require significant changes to our currently supported E-filing processes. In order to correctly populate the new 3A, 4A, 4B and 4C records, we will need to change our aggregation processes, databases, screens, reports and client maintenance procedures.
- 2) The certification process and testing with FinCEN is a concern, because FIS will need to complete that certification before software changes can be shipped to clients, pushing the 'internal deadline' for completion of changes earlier in the calendar year.
- 3) FIS is concerned about additional changes required to support the yet-to-be-released requirements of the DOEP e-filing records and the added effort to comply.



- 4) FIS has unanswered questions regarding the transition period from the existing e-filing file format to the new format, and whether it is necessary to retain previously reported CTR data in the old format for up to 5 years, or if previously reported data should be converted to the new format (even if it is not being re-reported). FIS would like guidance pertaining to this recordkeeping requirement.
  
- 5) The total FIS development hours required to comply with the new file format changes have been estimated at approximately 13,000 hours, which covers multiple products supporting the BSA E-Filing System.

In conclusion, FIS respectfully requests a **six month** extension to the June 30, 2012, effective date, in order to have the necessary time to develop and test the changes.

Thank you for considering our concerns and we would be happy to discuss these important systems issues and how they impact our customers and company at any time.

Sincerely,

Frederick Hopkins  
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FIS Enterprise Risk Management  
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