

From: [Richard E. Todd](#)
To: [Comments_Regulation](#)
Subject: Attention: BSA Required Electronic Filing
Date: Thursday, September 15, 2011 3:43:28 PM

Please continue the electronic submission of all BSA documents, specifically the CTR & SAR forms, to be optional.

Smaller institutions could see increases in costs and possibly lose a review process that assure accurate reporting.

I understand that most (approximately 80%) of all of these forms are already filed electronically although I believe that is due to the majority of reporters are large institutions that chose to use electronic format for money saving reasons due to economy of scale. We only need to file ten to twenty CTR forms a year and the current paper process works very well for us given this low number.

Respectfully,
~Richard



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