

From: [Cheri Lineberger](#)
To: [Comments_Regulation](#)
Subject: ""Attention: BSA Required Electronic Filing"
Date: Tuesday, September 27, 2011 10:00:33 AM

“Attention: BSA Required Electronic Filing,”

My Financial Institution currently files most of our CTRs and SARs electronically. However, we do have to continue to file a few paper CTRs due to issues with the company we use to monitor for and complete the CTRs.

Below you will find the reasons that we have to continue to file the paper version:

1. The E-filing system only allows 35 characters for a name on a CTR or SAR...this can be an issue when a customer has a name that is longer than 35 characters. I have to file these CTRs or SARs paper form to be able to include the whole legal title. I actually contacted a customer service member with E-file and was told to just file it with whatever letters it will allow and that I would probably get an error but it would be okay. I don't think an examiner or an auditor would find that to be okay since I would be filing a CTR or SAR using something other than the customers' full legal title.
2. The software provider we use also has a glitch within there system that will not allow us to check "Multiple Person" on some CTRs that have multiple conductors but only one conductor being named within the CTR. I have asked an examiner about this and was instructed to file paper form until the software provider was able to fix the problem within their system. I am sure other FI's use this company and should be experiencing the same issue.

At this time, I don't feel comfortable with my financial institution only using Electronic filing due to the possibility of Exam findings or recommendations.

Thank you,

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