

From: [Phillip Matous](#)
To: [Comments_Regulation](#)
Subject: Attention: BSA Required Filing
Date: Thursday, October 06, 2011 7:17:27 PM

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

1. Right now we simply pull the CTR form off the shelf and complete it in the presence of the credit union member.
2. No one likes a cumbersome log in process. Yet you (see below) are creating a several step process – two series of questions - just to get to the form we need to file the CTR. I don't know how many forms BSA necessitates. We use only the CTR and SARS. I suggest that when a financial institution (FI) logs in for the first time, you allow them at that time to choose which forms they normally use. Thereafter, when their employees log in, present them with those options preselected by their administrator.

The discrete filing function will be accessed by logging into the BSA E-Filing System and entering a pre-approved user ID and password. During log-in to the discrete filing option, filers will be prompted through a series of questions.

After log-in, a financial institution filing a report through the discrete function will answer another set of questions that will establish a subset of the data fields appropriate to the filer's specific type of filing institution.

3. Several of the items on the form can probably be prepopulated, such as the name of the Financial Institution and its address. You should have your system prepopulate the form for the FI once it has logged in, since at that time, the system knows which FI is submitting the form.
4. Since these forms may not be completed in one session, you should allow your system to remember the form and the information entered so that an employee can log out and log back in later to complete the form

without having to reenter data form the first session, at which time they would click on the 'submit' button.

5. You will have to allow them to correct data.
6. Allow them to attach supporting documents.
7. The system should allow the employee to print out the blank form. This will allow them to complete the form by hand. Once completed they can then enter the form electronically. This will also allow them to print out a supply of forms to keep on hand in the event the network goes down.
8. Can you have the system send a reminder email to the submitter and/or possibly their supervisor if the time for completing the form for timely submission is nearly expired?
9. Not all SSL systems are created equal. Please insure you have a high level SSL system. I would prefer you also used a top of the line security certificate issuer such as VeriSign and employ their extended validation certificate on the site.

Cordially,

Phillip A. Matous
President
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