

March 31, 2006

Comments from the FBI on the draft revised bank SAR form are as follows:

We support the eight SAR data perfection requirements, however we would like to see data perfection on bad dates, over-inflated amounts and missing bank names. In 9 out of every 10 batches of bank SARs we download from DCC, we find errors in the following date fields:

Suspect's Date of Birth  
Date of Suspicious Activity (from and to)  
Date SAR prepared

By errors, I mean a DOB being entered as something like 13/15/3005. This could be corrected on the front end by ensuring that data masks are used in the original input, either when filing via E-Filing or the banks' SAR preparation software.

We occasionally receive some SARs with inflated dollar loss and violation amounts. These problems usually stem from the banks typing in too many numbers to include the cents (i.e. They mean to say \$10,000 but type it in as \$1,000,000, thinking the two digit cents will be formatted with this). We also see the amount fields being filled with all 9's. These inflated and incorrect amounts skew our summary statistics and I'm sure FinCEN's and the other agencies' as well.

We see SARs with the bank name missing. We can sometimes work back to find this out, either by reading the narrative or contacting the preparer listed on the SAR.

When we see these errors, we pass them along to-----, who passes them on to RPPD for follow-up.

We fully support the idea of the internal control/file number field, but would like to see this as a mandatory field, not optional.

We would also like to see a field to capture the email address (if known) of the suspect. Email addresses are very good identifiers. With the banks using more Internet based banking practices, email addresses should be available on an increasing basis. This would be helpful on all the SAR forms.

We would like to see a check box on whether the suspect is an individual or an entity. Law enforcement is now using technology on an increasing basis to review and analyze SARs and other BSA reports. Software applications can sometimes determine this for us, but there are a number of names where it is difficult for the software to make a proper determination. This flag would greatly aid in this process. This would be helpful on all of the BSA forms.

These are the comments I've received thus far. I'll pass on anything additional I receive. Thanks for the opportunity to comment again on this form.