From: Sent: Jim Brown [brownji@ctbi.com] Friday, June 16, 2006 3:22 PM

To:

Comments, Regulation

Subject:

RIN 1506-AA85 "Money Services Businesses

We have a number of Grocery stores in our rural area who have been cashing checks for customer for years. These are seasoned accounts with long term relationships with the bank. We have trouble getting these businesses to register as a MSB. We have been filing SAR when the accounts are reviewed and determined to be a MSB. We have also advised the account holders of the need to file as an MSB. The bank must either close the account once they do not file as an MSB or have the burden of following up with an SAR every 90 days. There needs to be some provision to exempt these seasoned account holders who are MSB simply because they cash either payroll or U.S. Treasury checks as a service to their customers. A number of these individuals are un-banked.

If the current system goes un-changed there must be some strong communications from IRS and other Gov. Agency with these Grocery stores that they must register as an MSB. All of the burden of getting the information to account holders should not be put on banks.

Thanks for the opportunity to comment.

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