From:

Dianne Haberman [dhaberman@gunnisonbank.com]

Sent:

Thursday, August 10, 2006 4:22 PM

To: Cc: Comments, Regulation Ashley; Haberman, Dianne

Subject:

RIN 1506-AA86 Comments on ANPR

Comments regarding the potential burden of lowering the \$3,000 recordkeeping threshhold for funds transfers and transmittals of funds by financial institutions.

We analyzed increased volume over a one-month period using a \$1,000 threshhold. We averaged a 160% increase in volume over the current \$3,000 limit. None of the additional records pointed to suspicious activity. We are a small bank and the increased workload will have a significant impact on staff. Our funds transmittal practices will not change as a result of a change in the threshhold.