

**From:** Cindy Miller [Cmiller@fnb-la.com]  
**Sent:** Wednesday, May 10, 2006 4:52 PM  
**To:** Comments, Regulation  
**Subject:** RE: RIN1506-AA85

First National Bank of Louisiana in Crowley, Louisiana

>>> "Comments, Regulation" <RegComments@fincen.gov> 05/10/06 03:26PM >>>  
Thank you for your comments. Could you please provide FinCEN with the full name of your bank please? Thanks a lot.

-----Original Message-----

From: Cindy Miller [mailto:Cmiller@fnb-la.com]  
Sent: Tuesday, May 02, 2006 1:14 PM  
To: Comments, Regulation  
Subject: RIN1506-AA85

As requested, the following are comments pertaining to Money Services Businesses.

We are a community national bank with assets of about \$165 Mil. We have identified a couple of MSB customers and have worked with them to register as required. We have not closed any accounts because they were MSBs, nor have we refused to open any because they are MSBs. If other banks in our market area would refuse to do business with MSB customers, then we would have to reevaluate our decision based on the volume of requests. The biggest burden is the monitoring of these accounts, looking into history and deposit activity. I sympathize with banks that have 10 or 20 MSBs to monitor. I understand how they could make the decision to close existing accounts or not open new accounts.

The second comment I have relates to the regulators. I think a bank's decision to keep or open MSBs has a lot to do with how regulators examine the bank's MSBs and what kind of monitoring or other requirements are placed on the bank by the regulator. My exam with OCC went smoothly as it pertained to MSBs, but we are small and don't have many MSBs. I have heard horrible stories from other banks that had the opposite experience and thus made the decision to close all of their MSB accounts.

In response to item 6. on issues for comment pertaining to if there are steps that could be taken that could reduce perceived risks presented by MSBs. Yes. I realize the bank's responsibility to help identify an MSB based on their account activity and inform the customer of their responsibility to register. Once the customer is registered as an MSB then continued monitoring, educating, etc. should be the responsibility of the IRS, if that is the agency responsible for regulating them, not their financial institution.

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