

---

**From:** Pat Skinner [PLSkinner@acbanks.net]  
**Sent:** Monday, September 18, 2006 6:06 PM  
**To:** Comments, Regulation  
**Subject:** Financial Crimes Enforcement Network; Proposed Collection; Comment Request; Currency Transaction Report

You have requested comment on the proposed extension, without change, of the Currency Transaction Report (CTR), FinCEN Form 104, and you presented the following information to elicit response:

**Affected Public:** Business or other forprofit and non-profit institutions.

**Frequency:** As required.

**Estimated Burden:** Reporting average of 20 minutes per response. Form recordkeeping average of five (5) minutes per response, for a total of 25 minutes.

**Estimated number of respondents:** 54,524.

**Estimated Total Annual Responses:** 15,090,000.

**Estimated Total Annual Burden Hours:** 6,287,500.

**Request for Comments:** Comments submitted in response to this notice will be summarized and/or included in the request for OMB approval. All comments will become a matter of public record. Comments are invited on:

- (a) Whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
- (b) the accuracy of the agency's estimate of the burden of the collection of information;
- (c) ways to enhance the quality, utility, and clarity of the information to be collected;
- (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology; and
- (e) estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services to provide information.

I work in a commercial bank of approximately \$700 million in assets in the northwest of Georgia; we are not located in a metropolitan area.

I cannot assess, as to item (a) whether or not the collection of information is necessary for proper performance of the functions of the agency, nor whether the information collected has practical utility. Neither will I suggest ways to enhance the quality, utility, or clarity of the information collected (c) or ways to minimize the burden of collection (d).

I will comment, though, on items (b) and (e). As to item (b), I sincerely doubt that there is any bank in the nation that expends only 20 minutes "per response" (I am assuming "per response" means per CTR) on the CTRs that we process. Were all reportable cash transactions simply single transactions, consisting of more than \$10,000, then the 20 minutes per response might be reasonable. Given that FINCEN, Federal Deposit Insurance Corporation, and state of Georgia regulations and examination policies require that we report multiple transactions amounting to over \$10,000 per day, we are required to expend more than the stated 20 minutes.

In our bank, tellers typically begin the information collection process. To assist us in identifying multiple-transactions involving currency of more than \$10,000, we have chosen to begin collecting information when a customer has a cash transaction exceeding \$3,000 each day. To complete the transaction, the teller must collect all the data required to complete a CTR so we will have that information in case additional transactions that day result in a report being required. Each of those transactions (whether they result in a CTR being filed or not) requires approximately 10 minutes, assuming the customers are all fluent in the English language and have the required identifying documentation with him and that they do not engage the teller in a discussion of why we require that information. I estimate that we collect this information on 50 to 100 customers per day, easily (we have 7 branch offices). By extension, that would amount to 500 to 1000 minutes spent in collecting CTR information, whether or not we are required to process a report. This amounts to 1 to 2 man-days of work for **CTR preparation**.

We have a head teller that spends approximately one-half day per week reviewing transaction reports and teller-prepared CTR reports to insure they are completed fully and accurately. Additionally, we have a compliance officer that spends approximately one-half day per week (and sometimes more) in reviewing other bank reports (cash accumulation reports, currency transaction reports, etc) to make sure there are not more cash transactions (multiple transactions) that we need to report.

In an average week, we probably process and mail only 15 - 20 CTRs. To get these CTRs ready, though, may have taken us the equivalent of 2 - 3 days of one employee's working hours. If you assume that we submit 18 CTRs per week, and it takes us 960 to 1,440 minutes to produce them, then the average time per CTR reported is more like 53 - 80 minutes each.

As you can see, CTR processing and reporting is burdensome and the number of CTRs submitted does not necessarily reflect the actual time spent in complying with the regulations.

As to item (e): We are currently looking at a product called Patriot Officer, a widely-used software solution for anti-money laundering detection and reporting. If we choose to purchase this software, we do so knowing that this will be a non-productive expenditure. While the program may help us do a better job of reporting currency transactions and identifying suspicious activities, it will cost us a considerable sum of money to put it in place. Start up costs for this and similar, competitive products are priced in the \$25,000 - \$50,000 range, and monthly costs, usually based on account activity, are expected to cost our bank in excess of \$2,500 per month. This software can, but in our case will not, replace other systems which we currently have in place to assist us in identifying and reporting currency transactions. We also estimate this software will require an employee that is nearly (if not completely) dedicated to administration of the program and in the interpretation of reports it produces.

Thank you,

Patrick L Skinner  
EVP Risk Manager  
Appalachian Community Bank, Ellijay, GA

*This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to which they are addressed. This communication represents the originator's personal views and opinions, which do not necessarily reflect those of Appalachian Community Bank's. If you are not the original recipient or the person responsible for delivering the email to the intended recipient, be advised that you have received this email in error, and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you received this email in error, please immediately notify [postmaster@acbanks.net](mailto:postmaster@acbanks.net).*

*The sender believes that this E-mail and any attachments did not contain a virus, worm, Trojan horse, and/or malicious code when sent. This message and its attachments could have been infected during transmission. By reading the message and opening any attachments, the recipient accepts full responsibility for taking protective and remedial action about viruses and other defects.*