



National Pawnbrokers Association



July 10, 2006

Robert W. Werner
Director, Financial Crimes Enforcement Network
United States Department of the Treasury
P.O. Box 39
Vienna, Virginia 22183
Via email to regcomments@fincen.treas.gov
Re: RIN 1506-AA85

Dear Mr. Werner:

As you know, the National Pawnbrokers Association is a trade organization representing more than 2,400 members of the pawn industry and the majority of the pawn stores operating in the United States. We filed a comment in the original comment period for this Advance Notice of Proposed Rulemaking by email on May 9, 2006.

Subsequent to filing the comment, you extended the comment period. The extension has allowed us to communicate with members further and to ascertain the continuance of the trends mentioned in our original comment: (1) that bank discontinuance affects members of the pawn industry as well as of money services industry in many parts of the country; (2) that discontinuance is often on short notice and presents complex problems in terms of reestablishing banking relationships for pawnbrokers; and (3) on the brighter side, that in parts of the southeastern quarter of the country, some banks are working to reestablish relationships with pawnbrokers they formerly discontinued. In addition, we have heard from members that they think banks do not understand the differences between pure "money services businesses" and pawnbrokers as business enterprises, or recognize the radically lower risks of money laundering that pawnbrokers' businesses represent.

So, in addition to those comments we filed in May, we would ask FinCEN to help us clarify for banks that pawnbrokers present extremely low risks of money laundering because the vast majority of our transactions involved giving cash out and making transaction records that we regularly share with local law enforcement agencies. In those cases in which we disburse proceeds by check or funds transfers, we still make and keep full transaction records that we report to local law enforcement agencies as part of licensure requirements in most jurisdictions and we have the additional safeguards of auditable trails of bank transactions through the check clearing and funds transfer divisions of the banks involved.

Thank you for this opportunity to offer these additional comments.

Respectfully submitted,

Fran Bishop
President

PO Box 1040
Roanoke, TX 76262-1040
Phone: 817-491-4554 Fax: 817-491-8770

E-mail: info@nationalpawnbrokers.org Web: www.nationalpawnbrokers.org

Orlin, Lindsay

From: Bob Benedict CAE [bobbenedict@nationalpawnbrokers.org]
Sent: Monday, July 10, 2006 2:22 PM
To: Comments, Regulation
Subject: Re: RIN 1506-AA85

Please accept our attached comments on the referenced RIN 1506-AA85.

Bob Benedict CAE, Executive Director
National Pawnbrokers Association
bob@nationalpawnbrokers.org
bobbenedict@charter.net
817-491-4554
www.nationalpawnbrokers.org

Join NPA Now! 
Protect Your Business, Defend Your Rights