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"Jim Hopper" <jhopper@okgrocers.com> on 10/17/2003 04:42:12 PM

To: <210comments@fms.treas.gov>  
cc:  
Subject: 03DeptTreasLtr

October 17, 2003

To: Steven M. Vajs  
Director, Risk Management Division  
Financial Management Service  
US Department of the Treasury  
Room 423  
401 14<sup>th</sup> Street S.W.  
Washington, D.C. 20227

Fr: Jim Hopper  
Retailers Express Money Order Company

Re: Comment on Proposed Amendments to 31 CFR Part 210

Retailers Express Money Order Company is a small regional money order company that is regulated by state and federal agencies. Our company annually issues approximately three million money orders through our agents.

We oppose the amendment that would permit government agencies to convert money orders to

ACH debit entries for the following reasons:

1. The USA Patriot Act places responsibility on the issuers/payors and processors, payable through banks, of money orders to inspect for possible patterns of money laundering activity. A primary method for detecting money laundering is accomplished by inspecting endorsements on copy images of paid items. The conversion of money orders to ACH debits denies issuers/payors and processors their obligation to review these payments for money laundering activity.
1. To establish that a money order has been altered, e.g., amount raised, forged endorsement, or forged payee, it is necessary to view the original money order. Our money order company incurs significant expense embedding security features in the money order documents in order to protect ourselves and consumers that purchase our items. The value of the security features is diminished when replacement documents are produced.

Thank you for this opportunity to comment on the proposed amendments to 31 CFR Part 210

Jim Hopper