

Established in 1904 Member FDIC

August 10, 2006

Ms.Jennifer J. Johnson, Secretary Board of Governors Federal Reserve System 20th Street and Constitution Ave, NW Washington, DC 20551

Re: Docket No. R-1258

Dear Ms. Johnson:

The proposal to lower or eliminate the threshold for collecting, retaining, and transmitting information on funds transfer in the amount of \$3,000.00 or more would bring an unnecessary, additional burden on financial institutions.

There would be a greater burden for record keeping, more employee time and additional expense if the threshold is lowered or eliminated.

We would appreciate anything you can do to prevent any additional recording keeping burden for financial institutions.

Sincerely,

Ellen Shankles

Exec. Vice President/ BSA Officer