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Subject: EGRPRA

I would like to submit the following comments on Bank Secrecy Act, Anti Money Laundering and Regulation D Transaction Limitations.

BSA/AML -

It is far past time to reevaluate the CTR and monetary instrument transaction amounts. The amounts are no longer reasonable as they were when initially established. I believe these limits should be raised to at least \$25,000 and \$10,000 respectively. The current limits cause reporting of transactions to the extent that they become burdensome to both the banks that complete them and the agencies that review. This excessive reporting diminishes the purpose of the law and makes it less effective.

The biennial renewal of exempt customers is a redundancy. We are required to monitor annually and that process should be sufficient.

Twelve months is too long before a customer can be granted an exemption. If a well established business in our area (i.e. grocery store) moves an account from one bank to another our assessment as to the nature and legitimacy of this business should be sufficient to exempt the customer somewhere in the three to six month range. Otherwise we are filing CTR's daily and once again defeating the purpose.

There definitely must be examination guidelines. The examination process has become a stress-full anticipation of the unknown, resulting in defensive filing patterns. Examiners insist that customers must be assessed and monitored for risk but offer no more assistance than those that are non-exemptible must be high risk. I beg to differ that all non-exemptible customer types are high risk customers.

Reg D -

The transaction limitation on money market savings accounts needs to be removed. This is a regulation that no longer fits in with today's technology. With the offering of electronic banking we give our customers the freedom to manage their funds and then take it away with these outdated restrictions.

Thank you for the opportunity to comments on these issues.

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