

From: Global Currency, Inc., Adam Sragovicz
Subject: CRA - New & Revised Interagency Questions & Answers

Comments:

Board of Governors of the Federal Reserve System
Docket No. OP-1349

Interagency Questions and Answers Regarding Community Reinvestment Act

Gentlemen/Ms.:

We appreciate the opportunity to provide comments regarding the Interagency Questions and Answers Regarding Community Reinvestment Act, as published in the Federal Register on January 6, 2009.

As a money services business, our firm shares the mission of providing access to financial services to the unbanked and underbanked with the CRA. We feel that defining Community Development Services, as you have done in 12(i)-3, as "Providing international remittance services that increase access to financial services by low- and moderate-income persons" and "Providing [financial] services with the primary purpose of community development [such as] low-cost [check] cashing services" are important steps in clarifying the definition of community development services for banks.

Unfortunately, in our experience in working with banks, however, they are not mindful of the Interagency Interpretive Guidance on Providing Banking Services to Money Services Businesses Operating in the United States of April 26, 2005, which states, "While banking organizations are expected to manage risk associated with all accounts, including money services business accounts, banking organizations are not required to ensure their customers' compliance with all applicable federal and state laws and regulations."

In other words, even though FinCEN and other government agencies clearly allow work with money services businesses, within appropriate compliance frameworks, banks remain quite fearful of BSA / AML compliance exams. This atmosphere of such heightened concern on the part of banks makes providing these community development services significantly more difficult.

We take BSA / OFAC / AML / KYC issues extremely seriously, and have a comprehensive program for mitigating those risks. We also take a proactive approach, working with banking partners to identify additional tools and practices to manage these risks.

We also believe that bringing these customers and deposits into the banking system provides great societal and systemic benefit, both for the banks and new customers alike.

However, we cannot provide these services without banking industry partners. We would urge you to work with your colleagues in community development, BSA / AML compliance, and other community affairs forums to explain the important role of money services business in providing community development services in cooperation with banks.

We would also ask that innovative products with positive implications for community development (e.g. stored value cards for the unbanked) be identified

as such, and that banks' participation in these new banking products be encouraged.

I would be happy to discuss further or to provide additional information.

With thanks for your consideration and attention,

Adam Sragovicz, Senior Vice President, Banking Relations
Global Currency, Inc.
E-mail adamsr@unicache.com
Tel 858-405-3437