



October 4, 2016

Policy Division
Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183

To Whom It May Concern:

Re: Comments on Customer Identification, Anti-Money Laundering Programs and Beneficial Ownership Requirements for Banks Lacking a Federal Functional Regulator, RIN 1506-AB28

Alaska USA Federal Credit Union (Alaska USA) appreciates the opportunity to comment on the proposed rule concerning full compliance in all respects to Bank Secrecy Act (BSA) requirements for Customer Identification, Anti-Money Laundering Programs and Beneficial Ownership Requirements for Banks Lacking a Federal Functional Regulator. Alaska USA is a federally chartered credit union with nearly \$6.8 billion in assets and serving 589,000 members throughout the United States.

Alaska USA concurs with the Financial Crimes Enforcement Network (FinCEN) proposal to create a uniform compliance environment across all equivalent and applicable financial institutions operating within the United States' jurisdiction. This uniformity will further strengthen the entire banking system, by ensuring that all banks are held to the same BSA standards and requirements.

The current definition of a bank under the Code of Federal Regulations (CFR) Title 31, 1010.100(d) does not include payment and acceptance services. These businesses include PayPal, Western Union, Apple Pay and others that collectively transfer and settle millions of dollars in payments without being subject to BSA requirements. Expansion of the beneficial interest requirements to these entities would further enhance the overall transaction system compliance profile, while ensuring entities that conduct quasi-banking activities are held to similar standards and requirements as the banking system. We respectfully ask FinCEN to consider adding these entities as another category to be defined under Title 31, 1010.100(d).

Thank you for the opportunity to comment on the proposal. If you have any questions, please feel free to contact me at c.schwab@alaskausa.org or (907) 222-8985.

Sincerely,

A handwritten signature in black ink, appearing to read "Cory Schwab".

Cory Schwab
Chief Risk Officer