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General Comment

I agree with several other comments that have been posted regarding the form's "Unknown (check the box if you are unable to obtain this information)" option. Perhaps there are circumstances in which this is acceptable, but I haven't seen any rules that speak to this, and I've reviewed all final and proposed rules to date. As an attorney, I would guess that a number of clients may ask me why they have to spend 90-650 minutes (per FinCEN's estimates) locating this information, when they can simply check a box that they don't have that information and be done with it. And if there are circumstances in which this is an acceptable option, I'd like to know at what point too much Unknown information is going to result in a penalty, and whether the reporting company is under any obligation to continue to search for this information and update it at some later date. Thank you.