



National Public Record Research Association

110 Horizon Drive, Suite 210
Raleigh, North Carolina 27615

Via Electronic Submission - <http://www.regulations.gov>

Financial Crimes Enforcement Network
Policy Division
PO Box 39
Vienna, Virginia 22183

**RE: Commentary to Docket Number FINCEN-2023-21293, OMB Control
Number 1506-0076, Beneficial Ownership Information Reports**

Dear Sir/Madam:

This commentary is submitted by the National Public Record Research Association ("NPRRA"), the premier industry association for businesses engaged in the public record and corporate services industry, comprised of 135 member companies, including several commercial registered agent service companies and other companies engaged in public record filing and retrieval services. Together, NPRRA's members provide millions of business entities with registered agent services and/or assistance with submitting business entity filings to the offices of the secretaries of state and other similar offices in the 50 states and the District of Columbia.

NPRRA appreciates the opportunity to provide comments regarding the Notice of Information Collection Activities; Comment Request; Beneficial Ownership Information Reports.

NPRRA supports FinCEN requiring reporting companies to complete every form field on the Beneficial Ownership Information (BOI) report. Mandatory responses for

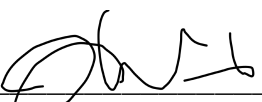
each text box will help to ensure that reporting companies provide all of the information required by the CTA.

We would like FinCEN to provide clarification on how the reporting company will certify the accuracy and completeness of the information on the BOI report, as required by law. Notably, the FinCEN Identifier application has certification language in item 18 with a check box for the individual submitting the application to certify that the information furnished is true, correct, and complete. It seems appropriate that the BOI report form have a similar certification box at the end of the form that states expressly that the *reporting company* itself is the one certifying. Some of NPRRA's membership will likely be offering a filing service to help their clients submit BOI reports to FinCEN. Since it is the reporting company's duty to certify, and not the third-party filer's that may offer a filing service, having such a certification box would help avoid confusion and facilitate compliance.

It would also be helpful to know prior to January 1, 2024, what information FinCEN will require third party filers to submit to FinCEN in order to be able to offer a filing service to reporting companies.

Thank you for your consideration.

Sincerely,



Joseph K. Winrich, President
On behalf of the Membership of NPRRA