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General Comment

While the FBAR demands considerable research on the part of non-resident taxpayers like me, it is unlikely to catch the big fish Treasury is looking for.

Rather than requiring any taxpayer with foreign accounts larger than \$10,000, why not increase the minimum to \$100,000?

This would reduce the workload of Treasury employees assigned to the FBAR file, while reducing the workload of less well-endowed non-resident taxpayers.