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## **General Comment**

As a CPA, I see how these regulations place an undue burden on US taxpayers who live abroad (in contrast to those who reside in the US and have foreign accounts) and obviously and naturally have financial accounts in their country of residence. At the very least, the burden of filing both the FBAR and Form 8938, which are highly similar, should be eliminated.

Not only is the US practically the only country in the world which has citizenship based taxation, it then enacts rules (such as FATCA) which make it difficult for expatriates in a host of ways.