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Comments Received:

Now that FATCA is fully in place, FBAR seems duplicative. If it IS necessary to retain the FBAR, (1) the threshold should be raised significantly, e.g., to require reporting only of accounts over \$500,000; and (2) the questions should be incorporated into the federal tax return, or at least the deadline should coincide with a taxpayer's tax filing deadline, including extensions. Using additional forms and different deadlines makes reporting more painful without improving the quality of the information reported. If anything, the resulting confusion may reduce the level of compliance.