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Comments Received:

FBAR information collection from U.S. citizens like myself who reside outside the United States is an undue burden. I've lived in Switzerland for 20+ years and have a Swiss pension plan as part of my work package. This means that the extremely low \$10,000 filing threshold adds to the administrative burden I have to undergo just to keep my US passport. It's a very low threshold that catches normal innocent Americans abroad living a normal life. Not to mention that I need to report the same information to FATCA, so a dual admin for the same info.

The FBAR exists to catch overseas money laundering, but often ends up ensnaring US citizens abroad who need a basic bank account in order to receive salary, pay their bills, and live a normal life. These aren't money launderers, they're innocent Americans who happen to live abroad. The FBAR should exclude Americans abroad to reduce the signal-to-noise ratio so Treasury can devote its resources to the actual overseas money launders.

This unfair treatment is a symptom of the overall problem - Americans abroad are treated as collateral damage in the war against overseas tax evasion and money laundering. The IRS recognizes Americans abroad as an underserved community. Surely that would mean that the FBAR is long overdue for review given that it is a massively complicated filing requirement that hasn't changed for over 50 years.

Instead of threatening innocent Americans abroad with life-altering penalties and burdensome filing requirements, the Department of Treasury should work with Congress to bring the US into line with the entire rest of the world in the way it taxes its expats.