Public Comments for ICR 202403-1506-001

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Comments Received:

I understand the need, and the reasoning, behind wanting to prevent financial crimes by using a form such as the FBAR. However, the way it is implemented is a serious hindrance to American citizens overseas.

- The \$10,000 filing requirement means that if an American overseas has any kind of even medium-level transaction overseas, they will need to report the highest balance of all of their foreign bank accounts the "collective balance" requirement makes it very hard to track and calculate if one has multiple accounts (for example, in local currency and USD). Apparently this form started in 1970 why is that number not adjusted for inflation like everything else concerning expatriate Americans (for example, the Foreign Earned Income Exclusion)?
- With the implementation of FATCA (another horrible idea that has caused innumerable pain to expatriate Americans abroad just trying to live their lives by threatening local banks, many of which *refuse* to do business with local American citizens because of FATCA requirements), you should have access to our account information anyway why the need for an extra form?

The amount of hassle and pain for American citizens abroad, who want to do their civic duty and file their taxes/financial records correctly and appropriately, is more than any other country in the world. The least you could do is make the requirements for this form updated compared to when it started 50 years ago.