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I am a US citizen living in Germany and working as an IT consultant for a large US company. I am required to file the FBAR annually and provide details of the maximum balance in my normal German checking account. I earn my money from my salary and my account balance occasionally exceeds the \$10,000 threshold but doing so should not make me in any way suspicious in the eyes of the law. I fail to see how this exercise provides the US government any useful information whatsoever. The general threshold should be raised from \$10,000, where it's been since 1970, to something like \$50,000; additionally, Americans abroad should have a higher dollar amount threshold in recognition of the fact that we have a legitimate need for banking services in the countries where we live. The fact that average people are required to submit the FBAR in large numbers creates a huge amount of noise that makes it harder to find money-launderers and other criminals. This noise should be removed.

To the extent the FBAR continues to be necessary, the filing process should be modernized. The current form is a fillable PDF. This should be replaced by a web-based system allowing entries to be easily duplicated (multiple accounts with the same bank, joint accounts with the same joint account holder, etc.) and persisted from year to year.

In closing I would like to mention that the 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 - that is, adopt residency based taxation, whereby nonresidents of the US only pay US tax on US sourced income.