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Comments Received :

Suggestions:

- 1) Filing should not be required by those living outside the US.
- 2) The filing threshold should be raised (accounting for inflation over the year) to \$50,000 or \$100,000. Or preferably, for consistency, the same thresholds as for IRS Form 8938 (see next point).
- 3) Account details should not be required for those who must file Form 8938. (It is ludicrous that one must report the same information to two different Treasury agencies!)
- 4) Account balances should be as of the end of the year, which would be much easier than trying to determine the maximum value during the year. (And I would think it would be at least as useful.)
- 5) Accounts with zero balance (at least for the whole year) should not need to be included. It is difficult to know/remember such an account was officially "closed".

Thank you for your consideration of these points.