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I agree with the analysis conducted by Democrats Abroad that the current information collected by FBAR is unnecessary. Though the Agency is aware of both public and government criticism of FBAR information reporting, it has taken no action despite the Secretary possessing broad authority to adjust reporting under 31 U.S. Code § 5314(b) to be more effective, less burdensome, and better targeted.

In the face of the such evidence of its lack of utility why continue the current FBAR information collection in its current form? The feedback is clear. I join other US taxpayers living abroad in urging the Director of the Office of Management and Budget to exercise her authority under 44 U.S. Code § 3507(h)(2) to disapprove this request for extension, and to instruct the Agency to undertake a rulemaking to make substantive changes in the information collection requirements that make it more equitable to other US citizens.

Thank you.