

Terry Ralph M

From: MNSenzyme [MNS@enzymexcultural.com]
Sent: Monday, January 03, 2011 6:44 AM
To: Terry Ralph M; 'Gerald'; Gerald.Shields@irs.gov
Subject: Tax reporting burden 8938

Dear Mr. Terry,
Dear Mr. Shields,

I am an American Women's Club member living in Germany. The new reporting requirements are an incredible additional burden. Since I was able to find a tax consultant who was keeping up to date with all of this (which in itself took many weeks of searching), I have spent more than \$100,000 in the last year and a half on tax consultant advice & help with all of the new rules & forms you all are concocting to catch ' tax fugitives'. This is almost more than my income, which is only dividends & interest! And is also way beyond what is reasonable considering the low amounts of investments (and resulting interest & dividends) I have for my three American children. It feels like we are being punished for saving for them. In any case, we are being punished for living abroad.

Your rules are worsening the economic safety of many American wives of foreign nationals since these men no longer want to give their wives signing powers over joint accounts, endangering their long term economic security. Several women I know have lost the kinds of joint signing powers that are normal & practical in an 'American' marriage.

Living abroad , one needs a local bank. But these local banks are refusing to work on American citizen accounts. I spent the past three years looking for someone to manage some investments and had to cross at least 10 institutions off the list because they no longer will work for an American citizen. My daughter, with her small savings, has had the same difficulty.

My checking account bank here only keeps the account because they have had it for so long. I have had to move the brokerage business because the brokerage considered the new US reporting requirements AND the investment restrictions to difficult to implement.(NO ETFs or mutual funds, etc since they are considered PFICS) The many hours of research , interviews & follow up required just to do normal banking has already become a huge burden on many ' normal' average Americans overseas. The tax reporting is becoming an expensive nightmare well beyond your 'time to fill out' estimates.

Worst of all, we are being discriminated against for choosing to live abroad- a scandal, considering that we are some of the country's most staunch and effective ambassadors.

Just because an American lives overseas, they should not be suspected guilty until proven innocent. The same reporting rules should apply to all Americans regardless of where they live. You do not ask in country living citizens for total net worth information. They do not have to send lists of highest balances on each their accounts. It is appalling, timeconsuming, & expensive, and putting Americans overseas at great disadvantage.

Short compliance deadlines have exasperbated the expense & confusion. The short timeframe for comments on 8938 (over the holidays when people should be spending time with their families) seem set to discourage comments.

Please send me a draft of the document by email immediately Please reconsider the necessity & fairness of these new requirements.

Best regards,

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