

Mr. Shields:

December 17, 2010

I am a United States citizen living in the country of France. I have recently reviewed a draft copy of the proposed form 8938 - STATEMENT OF FOREIGN FINANCIAL ASSETS and have the following comments.

Living in a foreign country already brings its own set of challenges. Having to adjust to a different cultural, learn a foreign language and submit the mountain of paperwork required by the foreign country in order to stay is stressful in itself.

By living in France we are required to file both a US Income Tax return as well as an Income Tax return in France. As you know, filling out and filing a US income tax return requires many, many hours. Add to it the additional time to prepare and file a French tax return causes one to have considerable time just in filing income tax returns for the two countries.

In my review of this new form I don't find the information that is being gathered to be of significant benefit to the US government. With all the paper work that is currently being filled out by US citizens living abroad I find additional forms unnecessary. Here are just a few that I was able to find on the irs.gov website:

Form TD F 90-22.1 - Report of Foreign Bank and Financial Accounts

Form 5471 - Information Return of U.S. Persons With Respect To Certain Foreign Corporations

Form 3520 - Annual Return to Report Transactions with Foreign Trusts and Receipt of Certain Foreign Gifts

Form 8865 - Return of U.S. Persons With Respect to Certain Foreign Partnerships

In my opinion, an additional form that is estimated to take a little over an hour to complete, is repetitive, unnecessary and unwanted.

Thank you for your time.

A handwritten signature in black ink that reads "Stephen M Hughey". The signature is written in a cursive, slightly slanted style.

Stephen M Hughey