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September 20, 2007

Office of the Comptroller of the Currency
250 E. Street, SW
Washington, DC 20219

RE: Agency Information Collection Activities: Proposed Information Collection;
Comment Request

Office of the Comptroller of the Currency:

I appreciate the opportunity to comment on the Bank Secrecy Act/Money Laundering Risk Assessment (MLR). I am writing as a representative of a small, community bank that finds the burden of completing the MLR to be excessive based on the validity of the information gathered.

- (a) I don't believe the MLR collection of information is necessary to determine our level of risk. Our risk assessment should give the OCC this information. How can it have practical utility when we have to adjust it to make it fit? See comment (c).
- (b) The OCC has estimated approximately 8 hours is needed to complete the MLR. I find this to be completely inaccurate. It took our staff a minimum of 50 hours to compile estimated data.
- (c) Information is allowed to be estimated and some of the information is very skewed because numbers and dollars need to match. For example: Our International Wire Transfers for 2006 should have been one daily transaction and \$3000. Instead, I had to use 17 daily transactions and \$17,000 to balance with the 17 different countries we had sent wires to. It's hard to see the real picture if we have to corrupt the data like this. There is a huge amount of risk difference between one daily international wire and 17. To enhance the quality, utility, and clarity of the data, stop the practice of matching numbers and dollars.

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(d) The only way to truly minimize the burden is to not collect the data. Read our risk assessment (which is now mandatory) to get a clearer picture of our risk.

(e) We have not purchased new software or services to complete the MLR. But as I stated before, it took a minimum of 50 man hours to complete the assignment. This would equate to approximately \$600.00 and time away from our other duties. This seems wasteful based on the inaccuracy of the data.

I believe the MLR is overly burdensome to small community banks who do not possess the software larger banks have. It takes extensive man hours to complete the MLR. I feel our time could have been better spent monitoring our high risk accounts and analyzing our data. Trying to combat money laundering should be our primary goal, not using our limited resources compiling useless data.

Thank you for allowing me the opportunity to comment on the Bank Secrecy Act/Money Laundering Risk Assessment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dawn Carpenter', written in a cursive style.

Dawn Carpenter
BSA Officer
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