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Attention: PRA Comments - Designation of Exempt Person Form.

Comments for the revisions projected to be made to the Designation of Exempt Person Form would be to reduce the signature lines (proposed to be lines 20 and 25). The current form also has two signature lines (currently lines 21 and 26). Both internal and external reviewers of Bank Secrecy have advised me the incorrect signature line was signed or that one should be signed not the other.

For example, I have had internal and external reviewers of BSA tell me that Line 26 on the current form should always be signed. I advised that "the form states" this is when you are updating a biennial exemption - reviewers thought otherwise. A second example is Line 21 on the current form. That is a confusing signature line as well for reviewers of BSA.

My suggestion of comment would be to have one (1) signature line on the new Designation of Exempt Form. Regardless of biennial updates or initial designations, one signature should suffice for whatever the reason to file the Designation of Exempt Person Form.

Having one signature line will reduce confusion with reviewers/examiners, plus make it easier for those who are the ones who file the forms not to worry that they may or may not be signing the correct line. Part 1, Line 1 of the new form already asks the reason for the filing of the form - whether (a) initial (b) biennial (c) amended (d) revoked. (the current form also has this same situation) Since Part 1, Line 1 is self-explanatory for the reason of exemption, one signature line will signify the reason for the filing from Part 1, Line 1.

Thank you for your consideration in amending the new form and reducing the signature lines from two to one.

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