



Indiana Credit Union League
The association of Indiana credit unions

January 4, 2021

Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183

Re: Requirements for Certain Transactions Involving Convertible Virtual Currency or Digital Assets; RIN 1506-AB47

To Whom It May Concern:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the proposed Requirements for Certain Transactions Involving Convertible Virtual Currency or Digital Assets. The ICUL member credit unions represent 99% of assets and members of Indiana's federally and state-chartered credit unions, with those memberships totaling more than 2.7 million consumers.

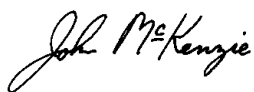
Generally, we agree with FinCEN's effort in its fight against money laundering, terrorist financing and other illicit activities; however, we believe this proposed rule will create an added regulatory expectation for credit unions already overburdened with compliance processes and costs. It is imperative that FinCEN strike the right balance between the imposition of compliance costs and the benefits to law enforcement. Under this proposal, it is not clear how credit unions and other regulated entities would have access to the required third party information needed to comply with this rule. Furthermore, the 15-day comment period is shorter than would normally be associated with a rule of this type, and the fact that it includes two federal holidays (Christmas Day and New Year's Day) is very limiting. It does not provide the appropriate time for parties to effectively research and determine the true impact of complying with this rule.

Often, credit unions work with a third-party software that tracks transactions and produces reports in order to comply with BSA-AML requirements. There has not been appropriate time for credit unions to work with their core processor and AML tracking software vendors to see if they can obtain the information needed to comply with the proposed requirements.

There should also be an evaluation of the associated compliance cost of this rule. Additional costs can be from third party vendors, updating automated systems and processes, staff training, testing and audits. With this in mind, we urge FinCEN to extend the comment period, so credit unions and other regulated entities can properly research how the proposed requirements would affect their operations. Additionally, we urge that FinCEN abstain from taking enforcement actions against credit unions that make a good faith effort to comply with this rule.

We appreciate the opportunity to comment on the proposal. We ask the FinCEN to consider our comments as discussed above. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,



John McKenzie
President, Indiana Credit Union League