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**NBA** Nebraska Bankers Association

September 6, 2002

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
ATTN: No. 2002-27  
FAX: 202.906.6518  
EMAIL: [rcgs.comments@ots.treas.gov](mailto:rcgs.comments@ots.treas.gov)

RE: Consumer Identification Program

Dear Sir:

I write on behalf of the Nebraska Bankers Association (NBA), a trade association representing 273 of the 275 commercial banks and eight savings and loans in the State of Nebraska. We are pleased to submit our comments regarding the recently issued Customer Identification Program regulations. While supportive of the general concepts underlying the proposed regulations, we believe that some of the provisions of the regulation may be overbroad and result in unnecessary burdens for the banking industry. Specifically, we would make the following points for your consideration.

1. The regulation should not apply to individuals "seeking" to open an account. Financial institutions should not be required to maintain records in situations where an individual does not actually receive financial institutions services;
2. Extending coverage of this regulation to all new signatories on an account is extremely problematic. In cases where multiple signatories to an account are large in number, verification of all of those individuals will be extremely costly. Perhaps the regulation could be clarified to provide a specific "risk-based" approach to the issue of multiple signatories;
3. The proposed five-year record retention period is excessive. A two-year period is more in keeping with many other record keeping requirements for financial institutions;
4. Requiring the copying and retention of drivers licenses is impractical and burdensome and will result in financial institutions utilizing other forms of verification. Retention

Office of Thrift Supervision

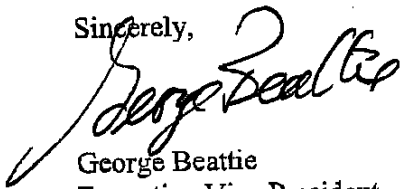
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of the account application form, with a notation of the information received, should be sufficient for compliance with the rule. In addition, a requirement to copy and retain an individual's drivers license may violate existing truth in lending regulations or other state laws which may restrict, if not prohibit, the retention of an individual's drivers license information.

Once again, we appreciate the opportunity to comment on the proposed regulations and trust that you will give our comments due consideration in issuing the final rule.

Sincerely,



George Beattie  
Executive Vice President  
[george.beattie@nebankers.org](mailto:george.beattie@nebankers.org)

/s/mi