

## COMMENT LETTER

February 23, 2023

# ICI Comment Letter on Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities

The Investment Company Institute (“ICI”) appreciates the opportunity to provide comments in response to the notice of proposed rulemaking (“NPRM”) issued by the Financial Crimes Enforcement Network (“FinCEN”) to implement provisions of the Corporate Transparency Act (“CTA”) that govern the access to and protection of beneficial ownership information (“BOI”).

As an initial matter, ICI appreciates FinCEN’s proposed amendment to the final BOI reporting rule<sup>4</sup> clarifying the conditions in which a reporting entity may report a FinCEN identifier. ICI believes it is crucial to the overall process for implementing the CTA for FinCEN to be able to adjust rulemakings promulgated in earlier phases of the three-phase process.

Read more in the [comment letter](#).