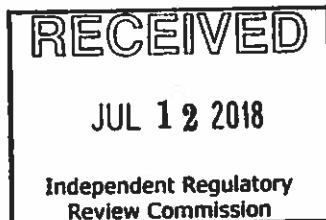


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July 12, 2018

Via electronic mail

George D. Bedwick, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Fl.  
Harrisburg, PA 17101

Re: Final Regulation 4-97—Local Earned Income Tax

Dear Chairman Bedwick:

On behalf of the more than 20,000 members of the Pennsylvania Institute of Certified Public Accountants (PICPA), I thank you for the opportunity to review and provide comments on the Local Earned Income Tax Final Regulation 4-97. Founded in 1897, the PICPA is the second-oldest and the fourth-largest CPA organization in the United States. Membership includes practitioners in public accounting, industry, government, and education.

The PICPA was instrumental in the passage of Act 32 of 2008, and more recently Act 18 of 2018, both which standardized, streamlined and improved efficiencies within the local earned income tax collection process. We are generally supportive of this proposal, with a few minor comments.

Section 151.1 – We suggest expanding the definitions section to include key terms. This will alleviate taxpayers and others from having to navigate between the statute and regulation for clarifications.

Section 151.3 – At the bottom of page 2, we recommend adding in reference for safe harbor, such as "... or the applicable safe harbor payment amount."

Section 151.23 (i) – The regulation is amended to add the phrase "meeting or exceeding SSAE 16 audit standards..." Is another audit standard contemplated? If so, what is it?

Thank you for the opportunity to comment on the final rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter N. Calcara".

Peter N. Calcara, CAE  
Vice President—Government Relations

cc: Hon. Mario Scavello  
Hon. Lawrence Farnese  
Hon. Brian Ellis  
Hon. W. Curtis Thomas  
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