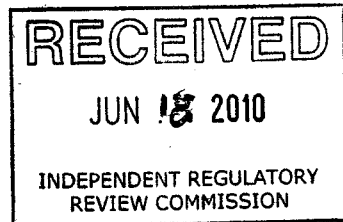


# 2847

**Creegan, Sean F. (GC-LI)**

**From:** Geoff Moomaw [geoffitsb@comcast.net]  
**Sent:** Monday, June 14, 2010 1:44 PM  
**To:** Ziemke, Michael  
**Subject:** Proposed Regulations



Dear Mr. Ziemke

We have reviewed the proposed amendments to 34 PA code, Part II, Subpart A, UC Chapter 61, Administration and desire to submit comment at this time. Proposed Section 61.25 – Confidentiality of information and fees, Subsection (a)(3)(2) and (3) concerns what is permissible disclosure of UC information to the last or base year employer. The proposed language appears to limit this information to the employer only. It is this limitation that causes our firm some concern.

We present approximately 1,900 employers in PA. As part of our service we contact the UC Service Centers, Employers’ Services in Harrisburg, Field Accounting Service, UC Referee Offices, etc., to inquire as to the status of individual claims on behalf of our clients. The language as proposed in the above cited sections appears to limit our ability, as well as the other consulting firms list in Section 22 of the Regulatory Analysis Form, to provide such a service to our client. In our case, we have executed a Power of Attorney for each client which authorizes us as follows:

“Do hereby make, constitute and appoint INTERSTATE TAX SERVICE, INC., My true and lawful attorney-in-fact with full power and authority to represent me before, and act on my behalf with, the,

1.  Office of Unemployment Compensation Tax Services, in any matter(s) relating to my liability for unemployment compensation contributions.
2.  Bureau of Unemployment Compensation Benefits and Allowances, in any matter(s) relating to unemployment compensation benefit payments.” (Form UC-884)

Our service is not only beneficial to PA employers, but also to the Department. We eliminate many calls the Department would receive from our clients when they don’t understand the UC Law, appeal process, determinations, Relief From Charges, etc. Furthermore, we also take what could be a 15-20 minute telephone call to Employers’ Service about why an employer is being charged in a certain claim and reduce that call to 2-3 minutes or eliminate the call outright.

Therefore, we would request that the proposed language of the above cited sections be modified to including the permissible disclosure of UC information to the last or base year employer, “as well as said employer’s duly authorized representative.”

In addition – our firm’s name and address in Section 22 of the Regulatory Analysis Form is wrong. We were listed in that section as Interstate Tax Service Bureau in Camp Hill, PA. We have moved and changed our name. Please adjust the Department’s records in this regard. Thank you.

Geoffrey D. Moomaw, President, Interstate Tax Service, Inc. \* PO Box 1490 \* Mechanicsburg, PA 17055-1490 \* 800-382-1395 \* 717-795-8839 (Fax) \* 717-805-6144 (cell)