

April 12, 2010

The Honorable Douglas H. Shulman  
Commissioner of Internal Revenue  
1111 Constitution Avenue, NW  
3000 IR  
Washington, DC 20224

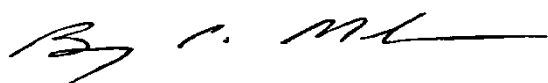
Dear Commissioner Shulman:

On behalf of the AICPA, we want to thank you for taking the time to meet with us on March 24. We appreciate the long term relationship the AICPA and the Internal Revenue Service have had with regard to promoting good tax administration and protecting the interests of the American taxpayer. As we stressed with regard to tax preparer registration, ensuring that tax preparers are competent and ethical is critical to maintaining taxpayer confidence in our tax system. Indeed, these goals are consistent with AICPA's own Code of Conduct and enforceable tax ethical standards.

As was raised with you in our meeting we do, however, want to reiterate our three underlying concerns with the examination aspect of your proposal: (1) a successful implementation of registration and use of PTINs, along with the imposition of Circular 230 on all preparers should be sufficient to address unethical and/or incompetent tax return preparation and provide tremendous gains to tax administration in general; (2) it will add to the potential for confusion in the marketplace regarding the relative competency of registered tax preparers, and (3) the additional burdens to the tax preparers and pass through of these costs to the taxpaying public should be considered. For these reasons, implementation of the testing process should be delayed until the results of the other proposals can be evaluated.

We are preparing our comments on the PTIN proposed regulations that were released the morning of our March 24 meeting. We have some serious concerns with aspects of those rules, most notably, the "non-signing preparer" construct; we will submit our detailed thoughts by the due date for comments. We look forward to working with you as the program is implemented.

Sincerely,



Barry Melancon  
President & CEO



Alan R. Einhorn  
Chair, Tax Executive Committee