



15 December 2015

Internal Revenue Service
CC:PA:LPD:PR (REG-138344-13)
Room 5203
POB 7604, Ben Franklin Station
Washington, DC 20044

RE: Comment on Substantiation Requirement for Certain Contributions (REG-138344-13)

IEEE-USA is writing to express its concerns regarding the Internal Revenue Service's proposed rule (REG-138344-13, as published at 80 FR 55802, 17 Sept. 2015), which would authorize organizations to collect and report Taxpayer Identification Numbers in the form of the donor's Social Security Number for donations of \$250 or more.

IEEE-USA represents the 200,000 U.S. members of the IEEE, a global technical professional organization organized as a not-for-profit under New York state law to foster technological innovation and excellence for the benefit of humanity. The IEEE Foundation serves as the charitable arm of IEEE and manages individual and corporate contributions made to increase the understanding of how technologies are created and how they impact society.

This proposed rule would create a new and precarious risk environment for non-profits with respect to securing donor data. Organization that elect to collect donor social security numbers to meet IRS substantiation requirements may lack the expertise and resources needed to secure highly sensitive personal data. Breaches of even well protected systems would expose donors to a wide range of cybersecurity threats including opportunities for identity theft, fraud and breach of privacy.

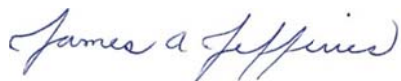
The rule specifies the size of the donation triggering the reporting requirement (\$250), but does not take into account the nature or means of the organization(s) receiving the donation. The rule as proposed would cover an extremely large range of prospective groups, from large Foundations and other non-profit organizations to small church and loosely organized community, social or afterschool groups. To expect all to have access to the high level of resources and

expertise required to manage and secure sensitive personal records, which are likely to be accessible electronically via computer networks, is unrealistic.

Moreover, the costs associated with providing acceptable levels of security for highly sensitive donor information such as a social security number would divert dollars away from the programs for which the donors contributed, and negatively inflate the program/administration ratios that are used to measure the effectiveness of Foundations and other charitable programs. In a similar vein, donors may be discouraged from giving if their target organizations and causes are not able to prove that they can secure the donor's sensitive personal data in a heightened risk environment.

Given the apparent effectiveness of the current process and in the absence of a compelling need to collect social security numbers for purposes of substantiation, IEEE-USA believes that the cybersecurity risks associated with even a voluntary SSN collection process greatly outweigh any value that might be realized in terms of tax compliance. For that reason, we respectfully urge the IRS not to proceed with IRS REG-138344-13.

Sincerely,

A handwritten signature in blue ink that reads "James A. Jefferies". The signature is written in a cursive, flowing style.

James A. Jefferies
2015 IEEE-USA President