



National Association
of Bond Lawyers

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September 18, 2020

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Charles P. Rettig
Commissioner
Internal Revenue Service
U.S. Department of the Treasury
1111 Constitution Avenue, NW
Washington, DC 20224

Re: Second Supplemental Letter Relating to User Fee Charges for State and Local Governments

Dear Commissioner Rettig,

The National Association of Bond Lawyers (NABL) has previously requested a reduction of user fee charges to state and local governments for private letter rulings related to tax-advantaged bonds. We have attached NABL's previous requests on these matters for your reference.

The economic effects of the COVID-19 pandemic on state and local governments accentuate the need for this relief in two respects. First, the cost of obtaining a private letter ruling was in many cases prohibitively expensive before the pandemic, and the strain on state and local governmental finances caused by the pandemic has made this situation worse. Second, the economic pain of the pandemic has prompted many state and local governments to pursue financing arrangements that may alleviate that pain. In many cases, these arrangements may raise novel tax questions for which there is no clear guidance and for which a private letter ruling may be helpful or necessary.

As the Internal Revenue Service periodically reviews fee structures for any number of its programs, we encourage you to consider a reduction of user fee charges to state and local governments for private letter rulings related to tax-advanced bonds.

If NABL can provide further assistance, please do not hesitate to contact Jessica Giroux, Director of Governmental Affairs, in our Washington DC office, at (518) 469-1565 or at jgiroux@nabl.org.

Sincerely,

Richard J. Moore
President, National Association of Bond Lawyers

CC:

Allyson Belsome, Senior Manager, Tax-Exempt Bonds, Internal Revenue Service
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Enclosures:

NABL Letter to the IRS dated March 4, 2020

NABL Letter to the IRS dated November 4, 2019