

November 10, 1999

Ms. Heather Rosenker
Executive Director
Advisory Commission on Electronic Commerce
3401 North Fairfax Drive
Arlington, VA 22201-4498

Dear Ms. Rosenker:

We are responding to the Invitation for Proposals Related to Electronic Commerce issued by the Commission. Enclosed you will find thirty copies of our response and a 3.5 inch computer diskette containing the response in Microsoft Word format.

We presented our first version of the system proposed herein to the Commission of the European Union back in July 1998. We have presented later versions to several government agencies in Canada as well as to the Federation of Tax Administrators at their Milwaukee convention. It was natural for representatives from these organizations to review the current incarnation of the system. While all agreed in calling our proposed solution very good and 'directly on point', we'd like to highlight the comment of the European Union representative: "what you propose meets all the requirements for developing international tax systems which have been set out in the work of the OECD".

We think part of their praise is due to the comprehensiveness and flexibility of the system. But, part is also due to the fact that we are proposing a standards-based approach that can ultimately be applied to all commerce and will significantly reduce the nation's sales and use compliance costs.

We appreciate the opportunity to make the Commission aware of our proposed solution and hope to discuss it further with the members at their San Francisco meeting.

Yours truly,

William P. Olders
President/CEO