

August 25, 2025

Andres Garcia
Internal Revenue Service
Room 6526
1111 Constitution Avenue NW
Washington, D.C. 20044

RE: Request for Comment on Forms 8822 and 8822-B (OMB Control No. 1545-1163)

Submitted electronically via email

Dear Mr. Garcia:

The American Bankers Association (ABA)¹ submits these comments in response to the request for comments on IRS Forms 8822 and 8822-B, recently issued by the Department of the Treasury (Treasury) and the Internal Revenue Service (IRS).²

Form 8822-B is generally used by businesses and other entities with Employer Identification Numbers to notify the IRS of mailing address changes, business location changes, and changes in responsible parties.

However, as detailed below, there are several issues related to the business address change process—including that there is currently no way for the IRS to determine if a Form 8822-B is authentic, in addition to the IRS accepting *other* methods of changing business addresses. These issues lead to major downstream problems for businesses, taxpayers, and the IRS.

ABA commends Treasury and the IRS for their ongoing efforts to improve address change processes and recommends several enhancements to strengthen the integrity and security of business address updates.

Namely, ABA recommends the IRS should institute additional controls related to business address changes, including notifying responsible parties via the IRS's Secure Object Repository (SOR) any time a business's address is changed.

¹ The American Bankers Association is the voice of the nation's \$24.5 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$19.5 trillion in deposits and extend \$12.8 trillion in loans.

² See 90 Fed. Reg. 27,756 (June 27, 2025).

Recommendation:

The IRS should institute additional controls related to business address changes, including notifying responsible parties via the IRS’s Secure Object Repository (SOR) when a business’s address is changed.

While Form 8822-B is the IRS’s designated method for reporting business address changes, the current Form 8822-B process is inherently flawed, as there is no way for the IRS to determine whether a business’s Form 8822-B is authentic. Thus, if a Form 8822-B generally *appears* valid (i.e., the form has no clear and obvious flaws), the IRS generally will accept and process the Form 8822-B without additional authorization from the taxpayer.

Further, the IRS currently accepts *other* methods of address changes without additional authorization from the taxpayer (e.g., Form 1096 or even invalid tax returns).

These practices have led, and will continue to lead, to numerous instances in which businesses are unaware that their official IRS addresses have been changed.

Issues stemming from these improper address changes are exacerbated by the fact that the IRS currently utilizes a *singular* physical mailing address for each taxpayer when sending a plethora of important mailings (e.g., CP2100 & 2100A, also known as “B Notices,” and 972CG civil penalty notices). These notices can be issued on paper or compact discs and contain personal taxpayer information.

As a result, many banks and other businesses must regularly perform exhaustive multi-location searches for IRS communications that are often fruitless because an address change has already occurred unbeknownst to the business account owner.

ABA is aware of multiple instances in which a bank’s physical address has been updated in the IRS’s systems without the account owner’s knowledge or consent—either inadvertently by customers or deliberately by alleged fraudsters seeking to exploit IRS systems. Examples include:

Bank A³

- An IRS refund check payable to Bank A for a significant amount was inadvertently sent to an unrelated individual’s residence rather than Bank A’s official address.
- Bank A’s address has been improperly changed twice in the past two months (as of the writing of this comment letter) without Bank A’s knowledge or consent.
- Bank A’s official address was changed to an incorrect residential address for 2023 B Notices without Bank A’s knowledge or consent.

³ Bank names have been changed for privacy concerns.

- Bank A's official address was changed to a storage unit for 2016, 2017, 2018 B Notices without Bank B's knowledge or consent.

Bank B

- An IRS refund check payable to Bank B for a significant amount was sent to a bank customer's business address rather than Bank B's official address. According to the bank customer, the IRS frequently sends tax notices to the customer's address rather than Bank B's official address.
- In October 2024, a bank customer informed employees at a Bank B branch location that B Notices for Bank B were being mailed to the customer's address rather than Bank B's official address.
- Bank B's official address was changed to an incorrect business address for 2023 B Notices without Bank B's knowledge or consent.
- Bank B's official address was changed to an incorrect residential address for 2020, 2021, 2022 B Notices without Bank B's knowledge or consent.

Bank C

- A customer mistakenly submitted a form triggering an address change for Bank C, resulting in IRS notices being sent to the customer's personal address rather than Bank C's official location.
- An individual submitted a falsified tax document to redirect IRS correspondence from Bank C's official address to an address controlled by the individual—potentially in an attempt to intercept sensitive taxpayer information and/or commit fraud.

Bank D

- Bank D's Head of Information Reporting frequently cannot authenticate herself to the IRS. She has a Centralized Authorization File number and a valid power of attorney via IRS Form 2848, but the IRS authentication process requires her to validate Bank D's address, which is frequently changed without her knowledge or consent.
- Bank D also had a refund check mailed to an incorrect address, and the check was subsequently cashed by the individual who, allegedly, fraudulently changed Bank D's address.

Bank E

- An unknown individual changed the name and address on Bank E's Transmitter Control Codes (TCCs), resulting in Bank E being unable to validate itself or use its existing TCCs in the IRS's Filing Information Returns Electronically (FIRE) system. Instead, Bank E was forced to close its TCCs, which it had been using for over 20 years.

To help rectify these issues, ABA recommends the IRS utilize a centralized electronic interface, similar to the Secure Object Repository (SOR), to notify responsible parties of business address changes made via Form 8822-B or otherwise.

Utilizing the SOR or a similar electronic means of communication for business address changes would enable responsible parties to quickly and objectively determine when a business address change has been processed, as pertinent notifications from the IRS would remain in a secure and retrievable electronic location.

This certainty would result in massive cost and time savings for the IRS but also for the business community—but, more importantly, these processes also would ensure that sensitive government and taxpayer data is not unnecessarily subject to a significant risk of inadvertent disclosure by being delivered to an incorrect physical address without a responsible party's knowledge.⁴

ABA is more than happy to work with the IRS on ways to implement additional controls related to notifying businesses of address changes made via Form 8822-B or otherwise, as additional security related to sensitive taxpayer data would not only greatly reduce fraud and identity theft—it also would improve the IRS's operational efficiency by preventing problems stemming from misdirected notices (e.g., fewer taxpayer calls to the IRS, fewer disputes, and fewer investigations), which would save the IRS valuable time and resources.

Conclusion

ABA acknowledges and appreciates Treasury and the IRS's efforts to improve the processes surrounding address changes, and ABA thanks Treasury and the IRS for considering our recommendations.

Please feel free to contact me (JConnor@aba.com) if you would like to discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Connor', with a stylized flourish at the end.

Joey Connor
Vice President, Tax Policy
American Bankers Association

⁴ Changing the method of delivery for notices containing taxpayers' personal information—in addition to implementing additional controls around this process—would further protect the IRS, and businesses, from inadvertent disclosure of sensitive taxpayer and business data.