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Dear Sir or Madam,

I represent Rimini Street (NASDAQ: RMNI), we are the global leader in providing third-party enterprise software support services for Oracle, PeopleSoft, JDE and SAP clients. In response to the additional comment period provided we would like to reiterate our previous recommendation from the first comment period, to extend the effective date to October 1, 2019.

This will enable the IRS to meet the one year implementation requirement. Employee's will have had an opportunity to complete their 2018 Federal income return and have a better understanding of their adjustments for line 5 through 8. This additional time will allow the Internal Revenue Service to complete general education to the public on the new requirements of filling out the new form W-4. This will assist in reducing the apprehension of the general employee not equipped to make an informed decision for completing the 1040 information required for lines 5 through 8. Furthermore the extended time will allow the payroll service providers and employers to adequately program and test these changes within their IT systems.

Below are supporting points for the recommended extension to the effective date of the June draft 2019 form W-4 changes:

- Requires significant programming modifications to employer's payroll systems, due to the complexity of the changes identified based on the June draft.
- The extension of the comment period delayed the release of the final draft expected in August.
- It is anticipated that the final draft will not be published until early November.
- Based upon previous timelines provided by the IRS, the final version would be published sometime in January since it must be approved by the OMB.
- As a result, the final code changes would not be delivered to employers until the final W-4 is released.
- With the timeframe of the final draft and the final release, this creates undue hardship to employers as they have no time to receive, test and move the changes into production prior to running the 1st payroll of January.
- Some employers have to process the 1st payroll in mid-December. The 1st payroll would not have the 2019 form W-4 tested and available to process.
- Employers will have additional risk associated with retaining the employee's confidential personal income information, as requested in the June draft form W-4.

Thank you for the opportunity to submit comments and considering our recommendation.