Expert Report Concerning the Costs and Burdens for Remote Retailers to Comply with Sales and Use Tax Collection Obligations Imposed by Jurisdictions Throughout the United States, Including Alabama
By Larry Kavanagh

August 28, 2017

This report concerns the costs and burdens for a remote retailer to register for, collect, and remit sales and use taxes imposed by state and local tax jurisdictions, including Alabama, in which the retailer has no physical presence. It is my opinion that compliance with Alabama sales and use tax obligations, as well as those of the many other jurisdictions that provide for sales and use taxes, presents a formidable burden and cost to a remote retailer that makes sales throughout the United States, including in Alabama. I disagree with the conclusion set forth in the expert witness report of Brian Erard dated February 22, 2017 that a remote retailer subject to Alabama's economic nexus rule, but not registered to collect Alabama sales taxes, would experience similar compliance costs to those of a retailer with multiple locations within Alabama that is registered to collect Alabama sales taxes. It is also noteworthy that Brian Erard admitted in his deposition testimony that he has not estimated the costs incurred by registered retailers with multiple locations in the first place. I also disagree with Brian Erard's conclusion in his deposition that a remote retailer merely needs to use software provided either by a third-party software company or the state in order to comply with Alabama's and other jurisdictions' tax collection obligations. There is no such thing as "plug and play" software that spans the multiple systems (website, order management, payment, etc.) affected by sales tax compliance efforts, a situation common for remote retailers. Setting up a system to collect sales and use tax in Alabama and other states is a major software project of the type that usually goes over budget and beyond the scheduled completion date.

Background

It is my understanding that the Supreme Court, in its decision in Quill v. North Dakota, stated that an interstate seller of products must have a physical presence in a state in order to be required to collect the sales and use tax on its sales to residents of the state. Alabama has adopted a rule, Sales and Use Tax Administrative Rule Number 810-6-2-.90.03, that imposes sales tax collection obligations on a retailer without a physical presence in Alabama, based on sales to Alabama residents and certain other activities that do not constitute a physical presence. This report explains the challenges and costs that out-of-state retailers face to comply with the Alabama rule and the laws of the many jurisdictions that impose sales and use tax collection obligations. In that regard, if Alabama may impose sales tax collection on a retailer without a physical presence, presumably every other state and locality could do so. It is, therefore, necessary to consider the costs of compliance not only with a single state, such as Alabama, but with multiple states where a retailer may have customers. According to Avalara, a provider of sales tax software, there are more than 12,000 taxing jurisdictions in the United States[1].

I define remote retailers as any company in which more than 50% of its total sales are made by mail, telephone or Internet order and that has no physical presence in a state in question.

My opinion is based on my experience, as recited below and in Attachment A, as well as the sources identified in Attachment B.

I founded DMinSite in 2001 and was its CEO from 2001 to 2011. DMinSite is an ecommerce platform company. During the time I was CEO, we launched more than 150 ecommerce websites and integrated

those sites with more than 500 third-party systems, some home grown by our clients, others produced by other software companies. We integrated our website software with Avalara, a sales tax lookup software, on four occasions. Our customers had annual on-line revenue between $1 million and $50 million. I stepped down as CEO in 2011 when the company merged with another firm and rebranded as Kalio. I stayed with Kalio until mid-2013. I have continued consulting with a number of ecommerce based retailers, as I did while I worked for Kalio. In 2013 I co-authored a report entitled "The Real World Challenges in Collecting Multi-State Sales Tax for Mid-Market Online and Catalog Retailers."[2] For this report I also drew to some degree on my experience, from 1991-1998, as general manager of Gardens Alive!, a catalog and online retailer with, at the time, $15MM in annual sales.

In contrast to my direct experience in systems implementation for businesses using ecommerce, it is important to note that based on a review of Brian Erard's report and the transcript of his deposition, Brian Erard has no experience in software projects and tax collection by remote retailers and other retailers. He relied principally on a 2006 study by Price Waterhouse Coopers ("PWC")[3], which was, in turn, based on data collected in 2003. The PWC study obtained data from 724 retailers, but only 4 were in the SIC code 5961, which represents remotes sellers: catalog, mail order and internet retailers (see page 14 and 15 of the report). The PWC report (as Mr. Erard confirmed) could not draw any conclusions about the compliance costs for remote retailers other than to note on page 16 that the ongoing compliance costs for remote retailers was higher than for other retailers. I also note that PWC did not determine the set-up costs associated with the integration of sales tax software into a retailer's website and other management systems. In my experience these set-up costs are significant, often many times the ongoing annual costs. Apart from a discussion of the PWC study, Dr. Erard appeared to focus on conversations with providers of third-party sales tax software and his feeling that advances in software would make integrations "easy" today. I also note that in his interviews, the sales tax software providers used as examples are companies whose order management and ecommerce systems are basic, and not the kind of systems that many remote retailers maintain.

In contrast to Brian Erard's report, my report and opinions are based on my concrete experiences and those of other companies in actually setting up software systems to collect sales tax and the real costs and burdens of doing so.

The Challenges for Remote Sellers

All retailers collect sales tax according to the rules of any state with which they have nexus. Thus, the remote retailer will collect sales tax levied by the state and local jurisdiction where it is headquartered. When collecting in more than one state, some remote retailers use a cloud software service like Avalara to lookup the correct sales tax rate, while others create their own custom software module. The latter is common when a retailer adds states one at time as their nexus expands.

Whether a retailer uses a system created by a software company like Avalara or creates its own custom software, this tax lookup module must be integrated into every system that interacts with customers and the customer's order in order to be able collect sales tax correctly. To make this integration easier, software companies like Avalara build communication protocols that facilitate the transfer of information. Sometimes software companies call these communication protocols "integration modules." However, these communication protocols are not "plug and play," meaning that they are not compatible with a retailer's systems without significant work to customize and integrate the software

and the retailer's existing systems. This is a major software project. At a high level, programming is required to:

1. Determine when to pass information to the module that looks up the sales tax rate associated with an item;

2. Retrieve data from the retailer's system to be passed to the sales tax lookup module;

3. Receive and store information back from the sales tax lookup module; and

4. Display and act on the information, including events such as sales tax holidays.

All of this work must happen inside the retailer's software systems. A third-party, like Avalara, can't do the programming work required to truly integrate their software with the retailer's systems. They are not (and cannot be) experts in the retailer's systems, many of which are either home grown or have been substantially customized.

There are additional complications when using a third-party tax lookup system provider like Avalara. The retailer, in connection with step two above, cannot just pass the product number or name of a product being purchased to a company like Avalara. Instead the retailer must translate the product into a proprietary set of merchandise codes. These codes are used by third party sales tax lookup providers to determine what type of merchandise is being sold. Different types of merchandise can carry different tax rates in different jurisdictions. There is often not a single tax rate for all consumer goods in a single state. Sales tax holidays also often only grant relief from sales tax based on both the type and item unit cost of a product. The retailer must create and maintain a translation table. Note: if a retailer has a home-grown sales tax lookup system they will still have to create a translation table for the same reason. My point in focusing on third party providers is to dispel the myth that remote retailers simply need to buy an off-the-shelf software and immediately their compliance burden is resolved.

Online and direct retailers often have several different software systems, not just a single system, that needs to be reprogrammed every time they collect sales tax in a new state. For most remote retailers these systems include a website, call center/order entry, and customer service/returns/exchange systems.

The costs for retailers break into two components: set-up and ongoing. My experience is that the set-up costs can be many times the annual ongoing costs, and that annual events, like sales tax audits, can also result in very significant costs.

The Set-Up Process

In a report that I co-wrote with Al Bessin, I estimated that a retailer with annual sales of $5 million to $50 million would need to spend between $80,000 and $290,000 to set-up (and truly integrate) a sales tax software program, such as provided by Avalara, with their website, call center and customer service/returns systems. Please note that these set-up costs are in addition to the estimated $20,000 to $50,000 in annual fees of the third-party software provider as well as the annual internal costs of maintenance, updates and audit representation, which I estimated to be $57,500 to $260,000 for

companies of this size. These estimates come from my ten years of experience providing websites and integrations to retailers.

Larger companies will pay more. I interviewed Jonathan Johnson, the former CEO and Board Chairman of Overstock.com on June 26, 2017[4]. He shared a summary report[5] from 2012 on Overstock's experience implementing a sales tax lookup system called Sabrix. Overstock spent $546,693 in out-of-pocket costs to set-up one state and estimated a cost of $350,000 to implement additional states. Johnson's Op-Ed in the Wall Street Journal in 2012 goes straight to one of the different challenges faced by a remote retailer as opposed to a bricks and mortar retailer with many locations. It is titled: "The Rights and Wrongs of Taxing Internet Retailers: The checkout clerk at a Wal-Mart never asks the customer where she lives or where she will be wearing the dress she is purchasing."[6]

Companies that provide sales tax software are blind to the costs and processes I describe below. Many have done a good job of making their part of the integration manageable for retailers. However, the bulk of the work, by necessity, occurs entirely on the retailer side. What follows below is a high-level, step-by-step description of the work that is required of a retailer.

1. **Create a requirements document and the project plan**. As demonstrated below, adding sales tax software is a complex project that touches many different systems used by a retailer. Usually the website and the call center/order entry software are maintained by separate engineering teams. A requirements document and project plan are necessary to effectively coordinate the work between the different programmers working on the project.

2. **Create a cross-reference table that maps the products a retailer sells to the sales tax software's proprietary Tax Codes**. Each sales tax software provider has created their own proprietary Tax Codes that represent a grouping of goods and services. For example, Avalara has separate Tax Codes for Honey, Yogurt, and Food Items used in Brewing. In total, Avalara has more than 4,000 Tax Codes[7]. When a retailer queries a sales tax provider for the appropriate tax rate, the retailer must send that sales tax provider's Tax Code for the item.

   Most of the retailers I have worked with sell 1,000 to 100,000 products. The burden is on the retailer to create the cross-reference table correctly, since if the wrong tax code is sent to the sales tax software provider, it could result in the wrong tax being applied. A retailer is liable for this difference if audited. There can be a significant startup cost for the retailer to map their products to the sales tax software provider's Tax Codes.

   Further, there is legal risk for the retailer, both from over-collecting and under-collecting tax. In State Tax Notes published November 2016, attorneys David W. Bertoni and David Swetland-Burland[9] detail the consequences of both. AT&T paid more than a billion dollars in a class-action suit for collecting tax from consumers that was not due. The authors also detail a number of tax whistleblower cases, *qui tam* actions, that resulted in back taxes assessed, along with penalties and fines as a result of mistakenly under-collecting. Third party sales tax lookup software companies disclaim liability for this, leaving the retailer fully exposed.

3. **Make the cross-reference table available to all the systems that need it.** Most retailers have at least three separate systems that will communicate with a sales tax lookup system. Each of

these systems needs access to the translation between Tax Codes and the retailer's product number. It is more efficient to maintain a master cross-reference table that can be updated when a retailer adds new product or the sales tax provider adds new Tax Codes. The latter happens when a taxing authority decides that a certain type of good or service should have special tax treatment.

There are several ways that a retailer might make the master cross-reference table available to the affected system. The retailer could choose to create a nightly, full-file transfer to "push" the file from data repository out to the affected system. Another method is to create/use an API (Application Program Interface) in the affected systems to allow the affected systems to "pull" the cross-reference file from its central location. Both processes require time and expense to develop and implement.

4. **Create programming changes in the affected systems.** The numerous steps a retailer must take to integrate sales tax information into an ecommerce website are set forth below. A similar process would have to be repeated in the call center/order management system and the customer service/returns system.

    - Determine when and where the website will trigger a call to the sales tax provider to look up the sales tax rate associated with an item. Since the website needs to send both the ship to address and the Tax Code, this usually happens at the end of an online shopping session. The retailer will also need to create a trigger to recheck the sales tax rate for an item when the ship-to address changes or a shopper abandons and later resumes a shopping session. It is very common for a shopper to begin a checkout process, but not complete it in the same session. Some of these shoppers return days or weeks later to complete their shopping session. However, given the time restrictions of sales tax holidays and periodic rate changes, remote sellers need to program their systems to determine if a tax rate previously obtained is still valid.

    - Look-up the Tax Code associated with an item and push it with the shopper's ship-to address to the sales tax provider.

    - Receive and store a sales tax rate for each item being ordered. As noted above, it's also important to store the date when the sales tax rate was received.

    - Create programming to handle situations where the sales tax provider cannot find the tax rate. For example, the sales tax software may not recognize the ship-to address or the retailer may not have entered a valid Tax Code into the cross-reference table. Usually a retailer will use a default tax rate in this situation and trigger a message to the IT department for follow-up.

    - Use the sales tax rate for each item to calculate the tax due, display it to the shopper, and include it in the total amount due.

- Note when the sales tax rate has changed (when the ship to address changes for example) and refresh the display to the shopper.

- Program special circumstances, such as coupons or discounts. A shopper may have a coupon that provides a dollar or percent savings when the shopper orders more than $x. For example, a shopper may have a $20 off coupon that is valid when the shopper orders $100 or more. These discounts effectively reduce the cost of each item being ordered. Because each item may have a different tax rate, the common practice is to apply the discount proportionally to each item, then calculate the sales tax due.

5. **Program sales tax holidays**. This is really a special case relative to point four, but is such a major issue I have broken it out for a more detailed discussion. States not only have start and end dates and times that must be programmed into the retailer's systems, but they also often have custom limits on the price of an item purchased and the allowable use of that item. For example:

   - Ohio had a recent sales tax holiday[10] which exempted clothes under $75 and school supplies and instructional materials under $20. However, if the items purchased were to be used in a business, the exemption did not apply.

   - At about the same time, Tennessee had a sales tax holiday[11] that applied to clothes under $100, school supplies under $100, and computers under $1,500. They did not appear to exclude items purchased for use in a business.

   Third-party providers like Avalara do not handle these exemptions for retailers. In their blog post published August 1, 2017 entitled "How to successfully handle sales tax during sales tax holidays,"[12] they detail the challenges. They conclude each challenge with a helpful note, like this one for the different item price limits: "Tip: Be sure state price restrictions are included in point of sale systems, and train staff so they're aware of them." In other words, all the work required to handle this challenge must occur in the retailer's systems.

   The blog post also explains that some states allow for coupons to reduce the price of item below the tax-exempt threshold, while other states do not. Even more difficult, many states allow local taxing jurisdictions to opt-out of the sales tax holiday. Alabama is one of the states that allows jurisdictions to opt-out. The burden of knowing these rules is on the retailer. Avalara is clear that they do not help with this.

   And, as mentioned above, remote retailers face a real legal threat if they get any of this wrong in any state or taxing jurisdiction.

6. **Test changes and roll-out to the live website**. The programmer(s) who made the changes described above will first test them on a local computer. Next, the programmer(s) will apply the changes to a copy of the live website, usually called a UAT (User Acceptance Testing) site. A business user will test the change in this copy of the live environment to make sure that the

changes work and have not inadvertently caused some other functionality to fail. As a result, the business user must test a shopper's full path through the website all the way to purchase, not just the specific change that was made. This level of care is necessary because the cost of a live website failing is high. Sometimes changes are returned to the programming team for re-work as a result of this user testing. Once a website change passes UAT, the change is then applied to the live website.

I recently consulted with a retailer on the costs they would incur if they engaged in a project to implement a system like Avalara. The retailer uses a mix of internal staff and external companies to support their corporate IT needs. Based on other recent projects the retailer had completed, we estimated:

- Creation of cross-reference table: the retailer sells 40,000 items. Assuming the classification takes 30 seconds per item, this requires 360 hours of labor. At a $50/hour cost, this totals $18,000.
- Planning, set-up and integration to their Order Entry/Returns system: 640 hours of programming/testing by their internal programming staff, 160 hours of project management by their IT Director. At a $75/hour cost for internal programmers and $150/hour for their IT director, this totals $72,000.
- Planning, set-up and integration into their website: $20,000 charge from their outsourced website provider, and 100 hours of testing and project management by the retailer (at $100/hour) for a total of $30,000.
- Studies have shown that cost overruns on the average IT/software project are between 27% and 60%[13,14,15]. Since this retailer typically sees a 33% cost and time overrun on the software projects, we estimated that the total cost of their project would be $155,000.

This estimate was calculated for a medium sized retailer. As noted above, larger retailers like Overstock face much higher costs. Overstock spent, out of pocket, over $500,000 for set-up in just one state[5]. Newegg has over 222,879 products for its own website and 34,458,953 products sold on its marketplace[8]. This is about 850 times more product than the example I use above. Their costs for setup would likely be in the several million dollars range, perhaps even in the tens of millions.

A sales tax software provider, like Avalara, cannot do this work for the retailer. The work requires a deep knowledge of the retailer's website, call center/order entry and returns system. My experience is that most providers of third party software have a poor understanding of the changes required by the retailer to use their product.

Ongoing Costs

Sales tax software providers charge an ongoing fee to retailers. Avalara, for example, charges $35,000 a year plus $0.13 per transaction over 500,000 transactions. With a company such as Newegg, the annual fee to Avalara could be in the hundreds of thousands of dollars.

However, this is just one component of the full ongoing cost to the retailer. Below are additional costs:

1. Retailers add new products to their stores. The cross-reference table that maps the retailer's products to the sales tax provider's Tax Codes has to be updated to reflect these new products. Newegg adds about as many products each year as it currently sells.

2. Tracking sales tax holidays and rules. States declare the times and dates of their sales tax holidays each year, as well as the items to which they apply. As well, many states allow local jurisdictions to opt-out of the tax holiday. A retailer must have staff continually checking these, then programming any resulting changes across all affected taxing jurisdictions.

   Taxing jurisdictions sometimes declare a sales tax holiday with little time to prepare. For example, the state of Alabama changed their 2017 back to school sales tax holiday from August to July[16]. Each jurisdiction in the state had until June 21, 2017 to decide if they were going to participate. The sales tax holiday began on July 21, 2017, giving remote retailers only one month to program the change correctly. Many retailers likely were not able to complete the changes in the time allowed, though they likely tried through the use of overtime and rush fees. As noted earlier, there are serious legal consequences associated with not correctly collecting sales tax at any time of year.

3. Every time the retailer makes a change to a system that uses the sales tax software (a change to the retailer's website, for example), the programming that enables the sales tax software must be retested. This is part of the "full path" testing described in point 6 in the set-up section.

4. While the third-party sales tax software providers automate reports and tax filings, the retailer must still review these before they are submitted. The liability for a mistake remains on the retailer. This could mean hundreds of extra filings to review. And the retailer must be prepared to answer questions posed by the taxing authority with which it files reports.

5. States and other taxing jurisdictions audits. These audits require preparation in addition to the time an auditor requires to ask questions of the retailer. Often a retailer will have to bring in outside counsel or accountants to answer the auditors' questions. The internal and external costs of audit can be staggering.

Other Costs

1. Most ecommerce websites avoid any calls to third-party systems during the checkout process. The reason is that these external calls rely on the internet to pass data back and forth, and there can be periods of slowness as data travels from point-to-point. In addition, many third-party software providers use the "cloud" to store and distribute their product. In February of 2017 Amazon, one of the largest providers of cloud storage, had a massive outage[17]. Including a third-party call in the checkout process will always cause some level of checkout friction due to temporary slow performance. For my mid-size retail clients, downtime like this will reduce sales by about $50,000 annually. For a larger retailer, like Overstock and Newegg, the resulting loss of sales could be in the millions.

2. Every few years most retailers decide to either upgrade or change their web platform. The integration work with the sales tax software provider described in sections 3 through 6 of set-up must be redone when this occurs.

Remote Retailers Are Not Equivalent to Instate Retailers with Multiple Stores

The complexity of being responsible for 12,000 taxing jurisdictions creates a much higher cost for retailers who sell remotely as compared to bricks and mortar retailers who have only one set of tax rates and rules to administer in each location.

Dr. Erard hypothesized that the compliance costs for remote retailers would be similar to the costs incurred by an instate retailer with multiple locations. However, he also noted that he did not speak to any retailers at all, whether in state or remote. He didn't name any sources for this hypothesis, nor did he have any cost estimate for this.

My own experience is that the two situations are quite different. Setting up and maintaining a system capable of calculating sales tax in all 12,000 taxing jurisdictions is very different from one that must calculate sales tax in just a single taxing jurisdiction. For example, a system that needs only to keep track of a single taxing jurisdiction does not need to:

- Create and maintain a cross-reference table that maps proprietary tax codes to a retailer's product.
- Transmit the address of a shopper to a third-party system.
- Recalculate the tax rate if the shopper's address changes.
- Have the ability to know/change sales tax in multiple, client facing systems (website, call center, customer service vs. a single point of sale system).
- Keep track of sales tax holidays in all taxing jurisdictions.
- Maintain appropriate tax exemption certificates in all jurisdictions; what is an acceptable certificate in Alabama is not acceptable in New York.
- Review and approve filings in all jurisdictions.
- Face tax audits from all jurisdictions.

A system that only needs to use one set of tax rules and tax rates is much simpler than one that must be able to represent 12,000 different possibilities. The burden is significantly disproportionate.

The fundamental problem with requiring remote retailers to collect according to the rules of all taxing jurisdictions.

A cheap, easy way for retailers to correctly present, collect, report on and be audited for sales tax in all taxing jurisdictions in the US does not exist. There is too much complexity in the software systems used by retailers and too much complexity in the rules across 12,000 taxing jurisdictions to allow for a "plug and play" system to work.

Unfortunately, the true costs that would be imposed on remote retailers if required to collect sales tax in all taxing jurisdictions are not well understood. I am not aware of a comprehensive, authoritative survey of remote retailers. The often quoted PWC study included only 4 remote retailers. It did not even attempt to estimate set-up costs for remote sellers, which are several times the ongoing costs. It is also significantly out of date.

What little data there is on this subject comes from providers of sales tax software. Sales tax software is just a module in a retailer's larger IT structure. It receives inputs, such as a proprietary tax code and the address of a shopper, and returns outputs, such as a tax rate. It doesn't do anything to create the inputs or process the outputs. As a result, the sales tax software providers who created these modules have a

poor (or no) understanding of what is required by a retailer to incorporate their data into websites and order management systems. And when they do provide examples of what is required of retailers, they tend to be the very simplest of examples that apply only to very small retailers.

Appendix A -- Larry Kavanagh | Curriculum Vitae

Experience

CEO — NaviStone 2016 — present

Spun NaviStone out of CohereOne to receive $7.4MM in Venture Financing.
NaviStone helps web based direct-to-consumer business find new customers.
150+ Clients including: Wayfair, Quicken Loans, Williams Sonoma

CEO — CohereOne 2014-2015

Consulting practice advising 40+ business on how to best combine catalog mailings and ecommerce.

CEO/Chief Strategy Officer — DMinSite/Kalio 2001-2013

Ecommerce platform, 100+ clients, most of whom used catalogs/direct mail

CEO — Lagniappe Marketing 1998-2001

Ecommerce consulting practice. Clients include: eBags, Garden.com, Phillips

President — Gardens Alive! 1991-1997

Mail Order Catalog business. Grew revenues from $5MM to $15MM

Education

Xavier University — MBA, Cincinnati, OH 1993-1994

University of Chicago — undergraduate 1983-1987

Awards

John F. Barrett Entrepreneur Vision Award 2016

Entrepreneur of the Year – Cincinnati Business Courier 2005

INC Magazine 500 Fastest Growing Companies 2004

Communication

Conference Presentations: Etail West, Shop.org, Internet Retailer, DMA, NEMOA, and more.

"The Real World Challenges in Collecting Multi-State Sales Tax for Mid-Market Online and Catalog Retailers" (September 2013)

Leadership

Chair, University of Chicago Parents Advisory Council 2014-2015

Current Board Member: Kalio, CohereOne, Loteda, NaviStone, American Catalog Mailers Association

Appendix B -- Sources

1) Avalara 12,000 taxing jurisdictions: https://www.avalara.com/learn/sales-tax
2) "The Real World Challenges in Collecting Multi-State Sales Tax for Mid-Market Online and Catalog Retailers" (September 2013) by Larry Kavanagh and Al Bessin
3) "Retail Sales Tax Compliance Costs: A National Estimate" By Price Waterhouse Cooper, published on April 7, 2006
4) Interview with Jonathan Johnson, former CEO and Board Chairman of Overstock.com on June 26, 2017
5) Overstock.com, Inc.'s Experience In Acquiring "Plug and Play" Sales and Use Tax Computation and Remittance Software -- sent by Jonathan Johnson, former CEO and Board Chairman of Overstock.com
6) Wall Street Journal Op-ed by Jonathan Joseph https://www.wsj.com/articles/SB10000872396390444873204577537192964218160
7) Avalara Tax Codes: https://taxcode.avatax.avalara.com/
8) Count of products NewEgg sells: Email from Matt Stratham, General Counsel for Newegg
9) "Barbarians at the Gate: Private State Tax Enforcement" by David W. Bertoni and David Swetnam-Burland, November 2016
10) Ohio Sales Tax Holiday: http://www.tax.ohio.gov/sales_and_use/SalesTaxHoliday.aspx
11) Tennessee Sales Tax Holiday: https://www.tn.gov/revenue/article/sales-tax-holiday
12) Avalara blog post on sales tax holidays: https://www.avalara.com/blog/2017/08/01/how-to-successfully-handle-sales-tax-during-sales-tax-holidays/
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14) "Panorama Consulting Report: 2015 ERP Systems"
15) "Delivering large-scale IT projects on time, on budget, and on value" by Michael Bloch, Sven Blumberg, and Jürgen Laartz. McKinsey and Company, October 2012
16) Alabama Sales Tax Holiday: https://www.ascpa.org/Content/Files/2017%20Docs/Back%20To%20School%20Tax%20Holiday.pdf
17) Outage in Amazon Web Services: http://www.seattletimes.com/business/amazon/outage-in-aws-storage-service-causing-online-disruptions/