

**Joseph E. Madden, CPA Comments dated November 26, 2025,
Reporting Form 1098-VLI**

Note: Page numbers are based on the PDF document consisting of 1 page (internal page numbering within that document differs).

Page no.	Summary of the Joseph E. Madden comments	Response to OMB
1	Increase the size of Box 2d to the size of Box 1, so the 17 digits can clearly be read.	IRS has no plans at this time to increase the size of box 2d.

**The Tax Shack Comments dated November 26, 2025,
Reporting Form 1098-VLI**

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Page no.	Summary of the Tax Shack comments	Response to OMB
1	Will the instructions for Form 1098-VLI be available and required to be sent to the owner of the qualifying vehicle(s)?	The form itself has "Instructions for Payer of Record". So if the questioner considered the "owner" to be synonymous with the "Payer of Record", the answer is "Yes". The instructions are always "available" (they would be on IRS.gov) but the "send" requirement depends on the definition of "owner". The instructions for the filer would not be sent to payer of record or owner, nor would they need to be sent.
1	Suggestion to add a section to determine if the vehicle was assembled in the US or not.	IRS accepts the recommendation for the Instructions for Form 1098-VLI. However, IRS declines to add this information to the "Payor of Record" instructions as the information on how to determine whether the final assembly of a vehicle was done in the United States is found in the instructions for Schedule 1-A, which are part of the TY25 Instructions for Form 1040 and 1040-SR.
1	Increase the size of Box 2d to the size of Box 1, so the 17 digits can clearly be read.	IRS has no plans at this time to increase the size of box 2d.

**A Plus Comments dated November 26, 2025,
Reporting Form 1098-VLI**

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Page no.	Summary of comments	Response to OMB
1	Increase the size of Box 2d to the size of Box 1, so the 17 digits can clearly be read.	IRS has no plans at this time to increase the size of box 2d.

**America's Credit Unions dated January 26, 2026,
Reporting Form 1098-VLI**

Note: Page numbers are based on the PDF document consisting of 1 page (internal page numbering within that document differs).

Page no.	Summary of comments	Response to OMB
1-2	They do not have access to all relevant information to determine if a vehicle qualifies. They encourage the IRS to allow lenders to report interest for all vehicle loans above the reporting threshold, even when eligibility is uncertain.	<p>Requiring interest recipients to report interest on all vehicle loans above the reporting threshold would exceed IRS's statutory authority. There is a statutory requirement that interest recipients must report on interest received on a "specified passenger vehicle loan." Section 6050AA(d)(2) defines a "specified passenger vehicle loan" as indebtedness described in §163(h)(4)(B) with respect to any "applicable passenger vehicle."</p> <p>Section 6050AA(d)(1) provides that terms used in §6050AA which are also used in §163(h)(4) shall have the same meaning. The term "applicable passenger vehicle" is defined in §163(H)(4)(D).</p>
2-3	They encourage the IRS to revise its burden estimates, so they better reflect the full cost of system changes and operational implementation, including start-up and ongoing costs.	IRS is transitioning Information Return segment from a legacy ADL model to the IRS Taxpayer Burden Model. The IRS Taxpayer Burden Model methodology controls the substitution of time and money by monetizing time and reporting total compliance costs in dollars. This methodology better reflects taxpayer compliance burden, because in a world of electronic tax preparation, time and out-of-pocket costs are governed by the information required rather than the form on which it is ultimately reported.
2	To improve reporting accuracy and reduce compliance risk, the IRS should provide additional guidance and instructions addressing specific data elements included on the form. For example, how credit unions can provide information, i.e. VINs, model year, make and model, which are not always retained by existing systems. How loan balances should be reported.	<p>Reporting this information is required by statute. Section 6050AA(b)(1)(2)(E) provides the statutory authority for Form 1098-VLI to include the year, make, model and VIN of the applicable passenger vehicle. Section 6050AA(b)(1)(2)(C) provides the information return must contain the amount of outstanding principal on the specified passenger vehicle loan as of the beginning of the calendar year.</p> <p>The filing instructions provide additional guidance and instructions regarding the reporting of "outstanding principal" amounts when a loan is</p>

		refinanced.
2	They strongly encouraged the IRS to prioritize standardized electronic reporting formats that integrate with existing loan servicing and tax reporting systems.	The option to provide electronic delivery of recipient statements is described in Section 4.6 of Publication 1179 which will be updated for TY26/FY27 to include Form 1098-VLI.
3	They encourage IRS to consider transition relief, phased implementation and/or safe harbor protections for lenders.	<p>IRS Notice 2025-57 provides transitional relief for the 2025 calendar year for lenders and other interest recipients who are required to file information returns with the IRS and provide statements to borrowers showing the total amount of interest received on a specified passenger vehicle loan (SPVL) and other information related to the loan.</p> <p>In addition, for the 2025 calendar year, the IRS will not impose penalties on lenders for failure to file information returns and provide payee statements if they satisfy their reporting obligations as described in the Notice.</p>