Internal Revenue
bulletin

Bulletin No. 2000–25
June 19, 2000

HIGHLIGHTS OF THIS ISSUE

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

INCOME TAX

Rev. Rul. 2000–30, page 1262.

Interest rates; underpayments and overpayments. The rate of interest determined under section 6621 of the Code for the calendar quarter beginning July 1, 2000, will be 9 percent for overpayments (8 percent in the case of a corporation), 9 percent for underpayments, and 11 percent for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding $10,000 is 6.5 percent.

T.D. 8885, page 1260.

Final regulations under section 368(a)(1)(C) of the Code relate to the solely for voting stock requirement in certain corporate reorganizations. Rev. Rul. 54–396 obsoleted.

Notice 2000–30, page 1266.

Individual Retirement Arrangements (IRAs); reporting requirements. This notice provides guidance relating to the completion of Forms 1099-R and 5498 to report IRA recharacterizations and reconversions occurring after 2000. Public comments are requested. Notice 98–49 modified.

ADMINISTRATIVE

Announcement 2000–55, page 1268.

Submission of tax shelter information. This announcement provides the mailing address, telephone number, fax number, and e-mail address for persons who wish to submit information to the Office of Tax Shelter Analysis.

Finding Lists begin on page ii.

Department of the Treasury
Internal Revenue Service

The IRS Mission

Provide America's taxpayers top quality service by helping them understand and meet their tax responsibilities and by applying the tax law with integrity and fairness to all.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly and may be obtained from the Superintendent of Documents on a subscription basis. Bulletin contents are consolidated semiannually into Cumulative Bulletins, which are sold on a single-copy basis.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations, court decisions, rulings, and procedures must be considered, and Service personnel and others concerned are cautioned against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.
This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.
This part is divided into two subparts as follows: Subpart A, Tax Conventions, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.
To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.
This part includes notices of proposed rulemakings, disbarment and suspension lists, and announcements.

The first Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis, and are published in the first Bulletin of the succeeding semiannual period, respectively.

For sale by the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

Section 368.—Definitions Relating to Corporate Reorganizations

26 CFR 1.368–2: Definition of terms.

T.D. 8885

DEPARTMENT OF THE TREASURY Internal Revenue Service 26 CFR Part 1

The Solely for Voting Stock Requirement in Certain Corporate Reorganizations

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Final regulation.

SUMMARY: This document contains final regulations relating to the solely for voting stock requirement in certain corporate reorganizations under section 368(a)(1)(C). The final regulations provide that a prior acquisition of a target corporation's stock by an acquiring corporation generally will not prevent the solely for voting stock requirement in a "C" reorganization of the target corporation and the acquiring corporation from being satisfied. They affect persons engaging in certain transactions occurring after December 31, 1999.

DATES: Effective Date: These regulations are effective May 19, 2000. Applicability Date: These regulations apply to transactions occurring after December 31, 1999, unless the transaction occurs pursuant to a written agreement that is (subject to customary conditions) binding on that date and at all times thereafter.

FOR FURTHER INFORMATION CONTACT: Marnie Rapaport, (202) 622-7550 (not a toll-free number).

SUPPLEMENTARY INFORMATION:

Background

On June 14, 1999, the IRS and Treasury issued a notice of proposed rulemaking in the Federal Register (REG–115086–98, 1999–26 I.R.B. 6 [64 F.R. 31770]) setting forth rules relating to the solely for voting stock requirement in reorganizations under section 368(a)(1)(C). The proposed regulations provided that prior ownership of stock of a target corporation by an acquiring corporation will not by itself prevent the solely for voting stock requirement of a "C" reorganization from being satisfied. The regulations propose to reverse the IRS's previous position that the acquisition of assets of a partially controlled subsidiary does not qualify as a tax-free "C" reorganization. See Rev. Rul. 54–396 (1954–2 C.B. 147). This position subsequently was sustained in litigation in *Bausch & Lomb Optical Co. v. Commissioner*, 267 F.2d 75 (2d Cir.), *cert. denied*, 361 U.S. 835 (1959) (the *Bausch & Lomb* doctrine). A public hearing regarding these proposed regulations was held on October 5, 1999. Written comments to the notice were received. After consideration of all the comments, the proposed regulations are adopted as revised by this Treasury decision.

Explanation of Revisions and Summary of Comments

The Applicability Date

The proposed regulations apply to transactions occurring after the date that a Treasury decision adopting the regulations is published in the Federal Register, except that they do not apply to any transactions occurring pursuant to a written agreement which is (subject to customary conditions) binding on the date that the regulations are published as final regulations in the Federal Register, and at all times thereafter.

A commentator requested that taxpayers be allowed to apply the proposed regulations to transactions occurring before the proposed regulations are published as final regulations.

The IRS and Treasury Department determined that the increased flexibility that results from the proposed regulations should be available to taxpayers in structuring transactions before their publication as final regulations. Accordingly, the IRS and the Treasury Department issued Notice 2000–1 (2000–2 I.R.B. 288), which changes the proposed effective date of the proposed regulations to apply to any transactions occurring after December 31, 1999, unless the transaction occurs pursuant to a written agreement binding on that date. Notice 2000–1 further provides that the proposed regulations, when finalized, will adopt this effective date rule and that taxpayers may rely on Notice 2000–1 until final regulations are issued. Accordingly, the final regulations adopt this effective date rule.

Finally, Notice 2000–1 provides that taxpayers may request a private letter ruling permitting them to apply the final regulations to transactions occurring on or after June 11, 1999 (the date the proposed regulations were filed with the Federal Register) to which the final regulations would not otherwise apply, and for which there was not a written agreement (subject to customary conditions) binding on June 11, 1999 and at all times thereafter. The Notice cautions, however, that a private letter ruling will not be issued unless the taxpayer establishes to the satisfaction of the IRS that there is not a significant risk of different parties to the transaction taking inconsistent positions, for U.S. tax purposes, with respect to the applicability of the final regulations to the transaction. Any such requests for a ruling will continue to be considered.

Extension of the Repeal of the *Bausch & Lomb* Doctrine to "B" Reorganizations

A comment was received requesting that the IRS reconsider its position in Rev. Rul. 69–294 (1969–1 C.B. 110), where the *Bausch & Lomb* doctrine was applied to disqualify a purported section 368(a)(1)(B) reorganization that followed a tax-free section 332 liquidation. In Rev. Rul. 69–294, X owned all of the stock of Y and Y owned 80 percent of the stock of Z. Y completely liquidated into X in a section 332 liquidation. As part of the plan, X (now owning 80 percent of the stock of Z) acquired the minority 20 percent stock interest in Z in exchange for X voting stock in a purported "B" reorganization. The ruling holds that the exchange with the 20 percent minority shareholders was not a "B" reorganization. The rationale is that although the acquisition from the minority shareholders was "solely for voting stock," the liquidation of Y, as part of the same plan, resulted in X acquiring 80 percent of the Z stock in exchange for Y stock surrendered back to Y on the liquidation of Y and not solely in exchange for X voting stock.

The commentator's suggestion is beyond the scope of this regulations project, which relates to "C" reorganizations. In light of these regulations, the IRS and Treasury Department may reconsider Rev. Rul. 69–294.

Effect on Other Documents

The following publication is obsolete as of January 1, 2000: Rev. Rul. 54–396 (1954–2 C.B. 147).

Special Analyses

It has been determined that this Treasury decision is not a significant regulatory action as defined in Executive Order 12866. Therefore, a regulatory assessment is not required. It also has been determined that section 553(b) of the Administrative Procedure Act (5 U.S.C. chapter 5) does not apply to these regulations and, because these regulations do not impose a collection of information on small entities, the Regulatory Flexibility Act (5 U.S.C. chapter 6) does not apply. Therefore, a Regulatory Flexibility Analysis is not required. Pursuant to section 7805(f) of the Internal Revenue Code, these regulations were submitted to the Chief Counsel for Advocacy of the Small Business Administration for comment on its impact on small business.

Drafting Information

The principal author of these regulations is Marnie Rapaport of the Office of the Assistant Chief Counsel (Corporate), IRS. However, other personnel from the IRS and Treasury Department participated in their development.

* * * * *

Adoption of Amendments to the Regulations

Accordingly, 26 CFR part 1 is amended as follows:

PART 1—INCOME TAXES

Paragraph 1. The authority citation for part 1 continues to
read in part as follows:

Authority: 26 U.S.C. 7805 * * *

Par. 2. Section 1.368–2 is amended by adding paragraph (d)(4) to read as follows:

§1.368–2 Definition of terms.

* * * * *

(d) * * *

(4) (i) For purposes of paragraphs (d)(1) and (2)(ii) of this section, prior ownership of stock of the target corporation by an acquiring corporation will not by itself prevent the solely for voting stock requirement of such paragraphs from being satisfied. In a transaction in which the acquiring corporation has prior ownership of stock of the target corporation, the requirement of paragraph (d)(2)(ii) of this section is satisfied only if the sum of the money or other property that is distributed in pursuance of the plan of reorganization to the shareholders of the target corporation other than the acquiring corporation and to the creditors of the target corporation pursuant to section 361(b)(3), and all of the liabilities of the target corporation assumed by the acquiring corporation (including liabilities to which the properties of the target corporation are subject), does not exceed 20 percent of the value of all of the properties of the target corporation. If, in connection with a potential acquisition by an acquiring corporation of substantially all of a target corporation's properties, the acquiring corporation acquires the target corporation's stock for consideration other than the acquiring corporation's own voting stock (or voting stock of a corporation in control of the acquiring corporation if such stock is used in the acquisition of the target corporation's properties), whether from a shareholder of the target corporation or the target corporation itself, such consideration is treated, for purposes of paragraphs (d)(1) and (2) of this section, as money or other property exchanged by the acquiring corporation for the target corporation's properties. Accordingly, the transaction will not qualify under section 368(a)(1)(C) unless, treating such consideration as money or other property, the requirements of section 368(a)(2)(B) and paragraph (d)(2)(ii) of this section are met. The determination of whether there has been an acquisition in connection with a potential reorganization under section 368(a)(1)(C) of a target corporation's stock for consideration other than an acquiring corporation's own voting stock (or voting stock of a corporation in control of the acquiring corporation if such stock is used in the acquisition of the target corporation's properties) will be made on the basis of all of the facts and circumstances.

(ii) The following examples illustrate the principles of this paragraph (d)(4):

Example 1. Corporation P (P) holds 60 percent of the Corporation T (T) stock that P purchased several years ago in an unrelated transaction. T has 100 shares of stock outstanding. The other 40 percent of the T stock is owned by Corporation X (X), an unrelated corporation. T has properties with a fair market value of $110 and liabilities of $10. T transfers all of its properties to P. In exchange, P assumes the $10 of liabilities, and transfers to T $30 of P voting stock and $10 of cash. T distributes the P voting stock and $10 of cash to X and liquidates. The transaction satisfies the solely for voting stock requirement of paragraph (d)(2)(ii) of this section because the sum of $10 of cash paid to X and the assumption by P of $10 of liabilities does not exceed 20% of the value of the properties of T.

Example 2. The facts are the same as in *Example 1* except that P purchased the 60 shares of T for $60 in cash in connection with the acquisition of T's assets. The transaction does not satisfy the solely for voting stock requirement of paragraph (d)(2)(ii) of this section because P is treated as having acquired all of the T assets for consideration consisting of $70 of cash, $10 of liability assumption and $30 of P voting stock, and the sum of $70 of cash and the assumption by P of $10 of liabilities exceeds 20% of the value of the properties of T.

(iii) This paragraph (d)(4) applies to transactions occurring after December 31, 1999, unless the transaction occurs pursuant to a written agreement that is (subject to customary conditions) binding on that date and at all times thereafter.

* * * * *

David A. Mader,
Acting Deputy Commissioner of Internal Revenue.

Approved May 9, 2000.

Jonathan Talisman,
Deputy Assistant Secretary of the Treasury.

(Filed by the Office of the Federal Register on May 18, 2000, 8:45 a.m., and published in the issue of the Federal Register for May 19, 2000, 65 F.R. 31805)

Section 6621.— Determination of Interest Rate

26 CFR 301.6621–1: Interest rate.

Interest rates; underpayments and overpayments. The rate of interest determined under section 6621 of the Code for the calendar quarter beginning July 1, 2000, will be 9 percent for overpayments (8 percent in the case of a corporation), 9 percent for underpayments, and 11 percent for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding $10,000 is 6.5 percent.

Rev. Rul. 2000–30

Section 6621 of the Internal Revenue Code establishes the rates for interest on tax overpayments and tax underpayments. Under § 6621(a)(1), the overpayment rate beginning July 1, 2000, is the sum of the federal short-term rate plus 3 percentage points (2 percentage points in the case of a corporation), except the rate for the portion of a corporate overpayment of tax exceeding $10,000 for a taxable period is the sum of the federal short-term rate plus 0.5 of a percentage point for interest computations made after December 31, 1994. Under § 6621(a)(2), the underpayment rate is the sum of the federal short-term rate plus 3 percentage points.

Section 6621(c) provides that for purposes of interest payable under § 6601 on any large corporate underpayment, the underpayment rate under § 6621(a)(2) is determined by substituting "5 percentage points" for "3 percentage points." See § 6621(c) and § 301.6621–3 of the Regulations on Procedure and Administration for the definition of a large corporate underpayment and for the rules for determining the applicable date. Section 6621(c) and § 301.6621–3 are generally effective for periods after December 31, 1990.

Section 6621(b)(1) provides that the Secretary will determine the federal short-term rate for the first month in each calendar quarter.

Section 6621(b)(2)(A) provides that the federal short-term rate determined under § 6621(b)(1) for any month applies during the first calendar quarter beginning after such month.

Section 6621(b)(3) provides that the federal short-term rate for any month is the federal short-term rate determined during such month by the Secretary in accordance with § 1274(d), rounded to the nearest full percent (or, if a multiple of 1/2 of 1 percent, the rate is increased to the next highest full percent).

Notice 88–59, 1988–1 C.B. 546, announced that, in determining the quarterly interest rates to be used for overpayments and underpayments of tax under § 6621, the Internal Revenue Service will use the federal short-term rate based on daily compounding because that rate is most consistent with § 6621 which, pursuant to § 6622, is subject to daily compounding.

Rounded to the nearest full percent, the federal short-term rate based on daily compounding determined during the month of April 2000 is 6 percent. Accordingly, an overpayment rate of 9 percent (8 percent in the case of a corporation) and an underpayment rate of 9 percent are established for the calendar quarter beginning July 1, 2000. The overpayment rate for the portion of a corporate overpayment exceeding $10,000 for the calendar quarter beginning July 1, 2000, is 6.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning July 1, 2000, is 11 percent. These rates apply to amounts bearing interest during that calendar quarter.

Interest factors for daily compound interest for annual rates of 6.5 percent, 8 percent, 9 percent, and 11 percent are published in Tables 66, 69, 71, and 75 of Rev. Proc. 95–17, 1995–1 C.B. 556, 620, 623, 625, and 629.

Annual interest rates to be compounded daily pursuant to § 6622 that apply for prior periods are set forth in the tables accompanying this revenue ruling.

DRAFTING INFORMATION

The principal author of this revenue ruling is Raymond Bailey of the Office of Assistant Chief Counsel (Income Tax and Accounting). For further information regarding this revenue ruling, contact Mr. Bailey on (202) 622-6226 (not a toll-free call).

TABLE OF INTEREST RATES
PERIODS BEFORE JUL. 1, 1975 - PERIODS ENDING DEC. 31, 1986
OVERPAYMENTS AND UNDERPAYMENTS

PERIOD	RATE	In 1995–1 C.B. DAILY RATE TABLE
Before Jul. 1, 1975	6%	Table 2, pg. 557
Jul. 1, 1975—Jan. 31, 1976	9%	Table 4, pg. 559
Feb. 1, 1976—Jan. 31, 1978	7%	Table 3, pg. 558
Feb. 1, 1978—Jan. 31, 1980	6%	Table 2, pg. 557
Feb. 1, 1980—Jan. 31, 1982	12%	Table 5, pg. 560
Feb. 1, 1982—Dec. 31, 1982	20%	Table 6, pg. 560
Jan. 1, 1983—Jun. 30, 1983	16%	Table 37, pg. 591
Jul. 1, 1983—Dec. 31, 1983	11%	Table 27, pg. 581
Jan. 1, 1984—Jun. 30, 1984	11%	Table 75, pg. 629
Jul. 1, 1984—Dec. 31, 1984	11%	Table 75, pg. 629
Jan. 1, 1985—Jun. 30, 1985	13%	Table 31, pg. 585
Jul. 1, 1985—Dec. 31, 1985	11%	Table 27, pg. 581
Jan. 1, 1986—Jun. 30, 1986	10%	Table 25 pg. 579
Jul. 1, 1986—Dec. 31, 1986	9%	Table 23, pg. 577

TABLE OF INTEREST RATES
FROM JAN. 1, 1987 - Dec. 31, 1998

	OVERPAYMENTS			UNDERPAYMENTS		
		1995–1 C.B.			1995–1 C.B.	
	RATE	TABLE	PG	RATE	TABLE	PG
Jan. 1, 1987—Mar. 31, 1987	8%	21	575	9%	23	577
Apr. 1, 1987—Jun. 30, 1987	8%	21	575	9%	23	577
Jul. 1, 1987—Sep. 30, 1987	8%	21	575	9%	23	577
Oct. 1, 1987—Dec. 31, 1987	9%	23	577	10%	25	579
Jan. 1, 1988—Mar. 31, 1988	10%	73	627	11%	75	629
Apr. 1, 1988—Jun. 30, 1988	9%	71	625	10%	73	627
Jul. 1, 1988—Sep. 30, 1988	9%	71	625	10%	73	627
Oct. 1, 1988—Dec. 31, 1988	10%	73	627	11%	75	629
Jan. 1, 1989—Mar. 31, 1989	10%	25	579	11%	27	581
Apr. 1, 1989—Jun. 30, 1989	11%	27	581	12%	29	583
Jul. 1, 1989—Sep. 30, 1989	11%	27	581	12%	29	583
Oct. 1, 1989—Dec. 31, 1989	10%	25	579	11%	27	581
Jan. 1, 1990—Mar. 31, 1990	10%	25	579	11%	27	581
Apr. 1, 1990—Jun. 30, 1990	10%	25	579	11%	27	581
Jul. 1, 1990—Sep. 30, 1990	10%	25	579	11%	27	581
Oct. 1, 1990—Dec. 31, 1990	10%	25	579	11%	27	581
Jan. 1, 1991—Mar. 31, 1991	10%	25	579	11%	27	581
Apr. 1, 1991—Jun. 30, 1991	9%	23	577	10%	25	579
Jul. 1, 1991—Sep. 30, 1991	9%	23	577	10%	25	579
Oct. 1, 1991—Dec. 31, 1991	9%	23	577	10%	25	579
Jan. 1, 1992—Mar. 31, 1992	8%	69	623	9%	71	625
Apr. 1, 1992—Jun. 30, 1992	7%	67	621	8%	69	623
Jul. 1, 1992—Sep. 30, 1992	7%	67	621	8%	69	623
Oct. 1, 1992—Dec. 31, 1992	6%	65	619	7%	67	621
Jan. 1, 1993—Mar. 31, 1993	6%	17	571	7%	19	573
Apr. 1, 1993—Jun. 30, 1993	6%	17	571	7%	19	573
Jul. 1, 1993—Sep. 30, 1993	6%	17	571	7%	19	573
Oct. 1, 1993—Dec. 31, 1993	6%	17	571	7%	19	573
Jan. 1, 1994—Mar. 31, 1994	6%	17	571	7%	19	573
Apr. 1, 1994—Jun. 30, 1994	6%	17	571	7%	19	573
Jul. 1, 1994—Sep. 30, 1994	7%	19	573	8%	21	575
Oct. 1, 1994—Dec. 31, 1994	8%	21	575	9%	23	577
Jan. 1, 1995—Mar. 31, 1995	8%	21	575	9%	23	577
Apr. 1, 1995—Jun. 30, 1995	9%	23	577	10%	25	579
Jul. 1, 1995—Sep. 30, 1995	8%	21	575	9%	23	577
Oct. 1, 1995—Dec. 31, 1995	8%	21	575	9%	23	577
Jan. 1, 1996—Mar. 31, 1996	8%	69	623	9%	71	625
Apr. 1, 1996—Jun. 30, 1996	7%	67	621	8%	69	623
Jul. 1, 1996—Sep. 30, 1996	8%	69	623	9%	71	625
Oct. 1, 1996—Dec. 31, 1996	8%	69	623	9%	71	625
Jan. 1, 1997—Mar. 31, 1997	8%	21	575	9%	23	577
Apr. 1, 1997—Jun. 30, 1997	8%	21	575	9%	23	577
Jul. 1, 1997—Sep. 30, 1997	8%	21	575	9%	23	577
Oct. 1, 1997—Dec. 31, 1997	8%	21	575	9%	23	577
Jan. 1, 1998—Mar. 31, 1998	8%	21	575	9%	23	577
Apr. 1, 1998—Jun. 30, 1998	7%	19	573	8%	21	575
Jul. 1, 1998—Sep. 30, 1998	7%	19	573	8%	21	575
Oct. 1, 1998—Dec. 31, 1998	7%	19	573	8%	21	575

TABLE OF INTEREST RATES
FROM JANUARY 1, 1999 - PRESENT

NONCORPORATE OVERPAYMENTS AND UNDERPAYMENTS

	RATE	1995–1 C.B. TABLE	PAGE
Jan. 1, 1999—Mar. 31, 1999	7%	19	573
Apr. 1, 1999—Jun. 30, 1999	8%	21	575
Jul. 1, 1999—Sep. 30, 1999	8%	21	575
Oct. 1, 1999—Dec. 31, 1999	8%	21	575
Jan. 1, 2000—Mar. 31, 2000	8%	69	623
Apr. 1, 2000—Jun. 30, 2000	9%	71	625
Jul. 1, 2000—Sep. 30, 2000	9%	71	625

TABLE OF INTEREST RATES
FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

	OVERPAYMENTS			UNDERPAYMENTS		
	RATE	1995–1 C.B. TABLE	PG	RATE	1995–1 C.B. TABLE	PG
Jan. 1, 1999—Mar. 31, 1999	6%	17	571	7%	19	573
Apr. 1, 1999—Jun. 30, 1999	7%	19	573	8%	21	575
Jul. 1, 1999—Sep. 30, 1999	7%	19	573	8%	21	575
Oct. 1, 1999—Dec. 31, 1999	7%	19	573	8%	21	575
Jan. 1, 2000—Mar. 31, 2000	7%	67	621	8%	69	623
Apr. 1, 2000—Jun. 30, 2000	8%	69	623	9%	71	625
Jul. 1, 2000—Sep. 30, 2000	8%	69	623	9%	71	625

TABLE OF INTEREST RATES FOR
LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

	RATE	1995–1 C.B. TABLE	PG
Jan. 1, 1991—Mar. 31, 1991	13%	31	585
Apr. 1, 1991—Jun. 30, 1991	12%	29	583
Jul. 1, 1991—Sep. 30, 1991	12%	29	583
Oct. 1, 1991—Dec. 31, 1991	12%	29	583
Jan. 1, 1992—Mar. 31, 1992	11%	75	629
Apr. 1, 1992—Jun. 30, 1992	10%	73	627
Jul. 1, 1992—Sep. 30, 1992	10%	73	627
Oct. 1, 1992—Dec. 31, 1992	9%	71	625
Jan. 1, 1993—Mar. 31, 1993	9%	23	577
Apr. 1, 1993—Jun. 30, 1993	9%	23	577
Jul. 1, 1993—Sep. 30, 1993	9%	23	577
Oct. 1, 1993—Dec. 31, 1993	9%	23	577
Jan. 1, 1994—Mar. 31, 1994	9%	23	577

Apr. 1, 1994—Jun. 30, 1994	9%	23	577
Jul. 1, 1994—Sep. 30, 1994	10%	25	579
Oct. 1, 1994—Dec. 31, 1994	11%	27	581
Jan. 1, 1995—Mar. 31, 1995	11%	27	581
Apr. 1, 1995—Jun. 30, 1995	12%	29	583
Jul. 1, 1995—Sep. 30, 1995	11%	27	581
Oct. 1, 1995—Dec. 31, 1995	11%	27	581
Jan. 1, 1996—Mar. 31, 1996	11%	75	629
Apr. 1, 1996—Jun. 30, 1996	10%	73	627
Jul. 1, 1996—Sep. 30, 1996	11%	75	629
Oct. 1, 1996—Dec. 31, 1996	11%	75	629
Jan. 1, 1997—Mar. 31, 1997	11%	27	581
Apr. 1, 1997—Jun. 30, 1997	11%	27	581
Jul. 1, 1997—Sep. 30, 1997	11%	27	581
Oct. 1, 1997—Dec. 31, 1997	11%	27	581
Jan. 1, 1998—Mar. 31, 1998	11%	27	581
Apr. 1, 1998—Jun. 30, 1998	10%	25	579
Jul. 1, 1998—Sep. 30, 1998	10%	25	579
Oct. 1, 1998—Dec. 31, 1998	10%	25	579
Jan. 1, 1999—Mar. 31, 1999	9%	23	577
Apr. 1, 1999—Jun. 30, 1999	10%	25	579
Jul. 1, 1999—Sep. 30, 1999	10%	25	579
Oct. 1, 1999—Dec. 31, 1999	10%	25	579
Jan. 1, 2000—Mar. 31, 2000	10%	73	627
Apr. 1, 2000—Jun. 30, 2000	11%	75	629
Jul. 1, 2000—Sep. 30, 2000	11%	75	629

TABLE OF INTEREST RATES FOR CORPORATE
OVERPAYMENTS EXCEEDING $10,000

FROM JANUARY 1, 1995 - PRESENT

	RATE	1995–1 C.B. TABLE	PG
Jan. 1, 1995—Mar. 31, 1995	6.5%	18	572
Apr. 1, 1995—Jun. 30, 1995	7.5%	20	574
Jul. 1, 1995—Sep. 30, 1995	6.5%	18	572
Oct. 1, 1995—Dec. 31, 1995	6.5%	18	572
Jan. 1, 1996—Mar. 31, 1996	6.5%	66	620
Apr. 1, 1996—Jun. 30, 1996	5.5%	64	618
Jul. 1, 1996—Sep. 30, 1996	6.5%	66	620
Oct. 1, 1996—Dec. 31, 1996	6.5%	66	620
Jan. 1, 1997—Mar. 31, 1997	6.5%	18	572
Apr. 1, 1997—Jun. 30, 1997	6.5%	18	572
Jul. 1, 1997—Sep. 30, 1997	6.5%	18	572
Oct. 1, 1997—Dec. 31, 1997	6.5%	18	572
Jan. 1, 1998—Mar. 31, 1998	6.5%	18	572
Apr. 1, 1998—Jun. 30, 1998	5.5%	16	570
Jul. 1. 1998—Sep. 30, 1998	5.5%	16	570
Oct. 1, 1998—Dec. 31, 1998	5.5%	16	570
Jan. 1, 1999—Mar. 31, 1999	4.5%	14	568
Apr. 1, 1999—Jun. 30, 1999	5.5%	16	570
Jul. 1, 1999—Sep. 30, 1999	5.5%	16	570
Oct. 1, 1999—Dec. 31, 1999	5.5%	16	570
Jan. 1, 2000—Mar. 31, 2000	5.5%	64	618
Apr. 1, 2000—Jun. 30, 2000	6.5%	66	620
Jul. 1, 2000—Sep. 30, 2000	6.5%	66	620

Part III. Administrative, Procedural, and Miscellaneous

Reporting IRA Recharacterizations and Reconversions

Notice 2000–30

I. PURPOSE

This notice specifies a new method to be used by IRA trustees, issuers, and custodians (hereinafter referred to as "trustees") for reporting IRA recharacterizations and reconversions occurring after 2000. The new method is similar to current reporting practices and is designed to ensure consistent reporting among trustees. This notice does not otherwise affect the reporting rules governing conversions, contributions to, or distributions from IRAs.

II. BACKGROUND

A. Recharacterizations and Reconversions

A "recharacterization" is a trustee-to-trustee transfer, made in accordance with § 408A(d)(6) of the Internal Revenue Code and the regulations thereunder, of a contribution (or a portion of a contribution), plus earnings, from one IRA (the "FIRST IRA") to another IRA (the "SECOND IRA"). A properly recharacterized contribution is treated, for Federal tax purposes, as a contribution made to the SECOND IRA, instead of to the FIRST IRA. Recharacterizations are permitted only between different types of IRAs; for example, from a traditional IRA to a Roth IRA and vice versa. See § 1.408A–5 of the Income Tax Regulations.

A "conversion" is the transfer, by rollover or other means, of an amount in a nonRoth IRA to a Roth IRA. A "nonRoth IRA" is an individual retirement account or annuity described in § 408(a) or (b), other than a Roth IRA. Any converted amount is treated as a distribution from the nonRoth IRA and a rollover to the Roth IRA. See § 1.408A–4, Q&A-1.

A "reconversion" is a conversion from a nonRoth IRA to a Roth IRA of an amount that had previously been recharacterized as a contribution to the nonRoth IRA after having been earlier converted to a Roth IRA.

In general, a recharacterization of a contribution must be made on or before the due date (including extensions) for filing the individual's Federal income tax return for the taxable year for which the contribution was made to the FIRST IRA. (See §§ 1.408A–5, Q&A-1(b).) Section 1.408A–5, Q&A-9, sets forth special timing rules for reconversions.

B. IRA Reporting Generally

A distribution from an IRA is reported on a Form 1099-R by the trustee of the IRA from which the distribution is made. Amounts that are reported as distributions on Form 1099-R include a contribution that has been recharacterized from the FIRST IRA to the SECOND IRA. When a recharacterization occurs, the trustee of the FIRST IRA issues a Form 1099-R. The instructions to Form 1099-R provide detailed information on how the form should be completed.

A contribution to an IRA is reported on a Form 5498 by the trustee of the IRA to which the contribution is made. Contributions that are reported on Form 5498 include a contribution that has been recharacterized from the FIRST IRA to the SECOND IRA. When a recharacterization occurs, the trustee of the SECOND IRA issues a Form 5498. The instructions to Form 5498 provide detailed information on how the form should be completed.

C. Prior Guidance on Reporting Recharacterizations and Reconversions

Pursuant to §§ 408(i), 408A(d)(3)(D), and 6047 of the Code and § 1.408A–7 of the regulations, the Internal Revenue Service has previously issued guidance on the reporting of transactions involving IRAs, including guidance relating to the reporting of recharacterizations and reconversions. Notice 98-49, 1998–2 C.B. 365 (September 21, 1998), sets forth a general rule for reporting recharacterizations. Under Notice 98–49, the gross amount transferred in a recharacterization is reported by the trustee of the FIRST IRA on a Form 1099-R. That same amount is also reported by the trustee of the SECOND IRA on a Form 5498 that is separate from any Form 5498 otherwise required for the SECOND IRA.

Announcement 99–5, 1999–3 I.R.B. 16 (January 19, 1999), provides that, in lieu of the reporting method described in Notice 98–49, an alternative method of reporting may be used with respect to recharacterizations that occur in 1998 and 1999 using the same trustee. Announcement 99–106, 1999–45 I.R.B. 561 (November 8, 1999), extended the alternative method provided for in Announcement 99–5 through 2000. Announcements 99–5 and 99–106 also apply to reconversions.

III. FORMS 5498 AND 1099-R REPORTING REQUIREMENTS FOR IRA RECHARACTERIZATIONS AND RECONVERSIONS AFTER 2000

To simplify IRA administration and to enhance IRA owners' understanding of the Forms 5498 and 1099-R they receive from the financial institutions maintaining their IRAs, the Service and Treasury believe that there should be a consistent method for reporting recharacterizations and reconversions. After consideration of comments from trustees and other organizations involved in the administration of IRAs and from other interested parties, the Service and Treasury believe the following method best accommodates current industry practices and simplification of reporting these transactions.

The new reporting method generally retains the requirement of Notice 98–49 that amounts recharacterized be identified separately from other types of distributions and contributions. The new method replaces the alternative methods permitted by Announcements 99–5 and 99–106. It is effective for recharacterizations and reconversions that occur after 2000.

Each recharacterization or reconversion occurring after December 31, 2000 (including a recharacterization or reconversion of an amount contributed before January 1, 2001), whether or not using the same trustee, must be reported as provided in Forms 5498 and 1099-R and the accompanying instructions. It is anticipated that these forms and instructions will prescribe the rules set forth in A through C below.

A. Form 1099-R Reporting of Recharacterizations by the Trustee of the FIRST IRA

Gross Amount Reported. The gross amount transferred in a recharacterization (contribution plus earnings) is reported on Form 1099-R.

Prior and Current Year Recharacterizations Distinguished. Recharacterizations that occur after the year for which the contributions being recharacterized were made ("prior year recharacterizations") and recharacterizations that occur in the same year as the year for which the contributions being recharacterized were made ("same year recharacterizations") must be reported on separate Forms 1099-R. Prior year recharacterizations will be coded with the existing Code R in Box 7, while same year recharacterizations will be coded with a new code, N, in Box 7.

Because prior year recharacterizations and same year recharacterizations will be separately coded, these amounts may not be reported together on the same Form 1099-R. Similarly, because a recharacterization will have a different code than other reportable distributions, a recharacterization may not be reported together with another reportable distribution on the same Form 1099-R.

Combined Reporting of Similar Recharacterizations. All prior year recharacterizations from the same FIRST IRA must be reported together on a single Form 1099-R using Code R in Box 7. All same year recharacterizations from the same FIRST IRA must be reported on a single Form 1099-R using the new code in Box 7.

Example 1. (i) On December 15, 2000, Taxpayer B makes an initial contribution of $2,000 to a traditional IRA (the FIRST IRA). On January 16, 2001, B makes another contribution to this IRA in the amount of $1,000 for the year 2001. On February 15, 2001, B makes another contribution to this IRA, again in the amount of $1,000 for the year 2001.

Pursuant to B's election, all three contributions are recharacterized as contributions to a Roth IRA (the SECOND IRA) on April 2, 2001. As of April 2, 2001, the earnings attributable to the initial contribution are $300, the earnings attributable to the second contribution are $200, and the earnings attributable to the third contribution are $150.

(ii) The trustee of the FIRST IRA issues B a 2001 Form 1099-R for the prior year recharacterization of the initial contribution. The gross amount of the transfer ($2,300) made in connection with the recharacterization of the initial contribution is shown in Box 1 and Code R is used in Box 7.

The trustee of the FIRST IRA also issues B a second 2001 Form 1099-R for the two same year recharacterizations. This Form 1099-R will show $2,350 (the combined gross amount of the transfers made in connection with the recharacterization of the two 2001 contributions ($1,000 + $200 + $1,000 + $150)) in Box 1 and will use the new Code N for same year recharacterizations in Box 7.

B. Form 5498 Reporting of Recharacterizations by the Trustee of the SECOND IRA

Gross Amount Reported. The gross amount received in a recharacterization (contribution plus earnings) is reported on Form 5498.

Recharacterization Contributions Distinguished from Rollover Contributions. Recharacterizations will be reported in a new box on Form 5498 titled "Recharacterized contributions" (instead of in Box 2 as provided in Notice 98–49) and the checkbox titled "Rechar." will be eliminated.

Requirement of Separate Forms 5498 for each Recharacterization Eliminated. All recharacterized contributions received by an IRA in the same year are permitted to be totaled and reported on one Form 5498. Alternatively, each recharacterized contribution can be reported on a separate Form 5498.

Single Form 5498 Covering All Contributions Permitted. A single Form 5498 is permitted to be used to report all contributions (including recharacterized contributions) made to an IRA in a year. Alternatively, each contribution can be reported on a separate Form 5498.

Example 2. (i) Taxpayer C has made two contributions to her traditional IRA (the FIRST IRA). The first contribution, in the amount of $2,000, was made on November 1, 2000. The second contribution, also in the amount of $2,000, was made on February 1, 2001, for 2001.

Pursuant to C's election, the November 1, 2000, contribution is recharacterized as a contribution to a Roth IRA (the SECOND IRA) on April 2, 2001, at which time the earnings attributable to the November 1, 2000, contribution are $100. Then, pursuant to C's election, the February 1, 2001, contribution is recharacterized as a contribution to the SECOND IRA on December 12, 2001, at which time the earnings attributable to the February 1, 2001, contribution are $850.

(ii) The trustee of the SECOND IRA issues C a single 2001 Form 5498 on which both recharacterizations are reported. That Form 5498 will show, in a new box, $4,950 ($2,000 + $100 + $2,000 + $850). Alternatively, consistent with Notice 98–49, the trustee of the SECOND IRA may issue two 2001 Forms 5498, one reporting $2,100 and one reporting $2,850.

C. Form 1099-R and Form 5498 Reporting of Reconversions

Reconversions are reported on Forms 1099-R and 5498 in the same manner as other conversions. The alternative method described in Announcements 99–5 and 99–106 will not be available for reconversions occurring in 2001 and thereafter.

EFFECT ON OTHER DOCUMENTS

Notice 98–49 is modified.

REQUEST FOR COMMENTS

The Service and Treasury invite comments and suggestions concerning the guidance provided in this notice. Any correspondence received will be evaluated, together with the needs of the Service, to determine whether further guidance on this subject is needed.

Comments can be submitted to CC:DOM:CORP:R (Notice 2000–30), room 5226, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. Comments may be hand delivered between the hours of 8 a.m. and 5 p.m. to CC:DOM:CORP:R (Notice 2000–30), Courier's Desk, Internal Revenue Service, 1111 Constitution Avenue N.W., Washington, DC. All comments will be available for public inspection and copying.

DRAFTING INFORMATION

The principal author of this notice is Roger Kuehnle of Employee Plans (Tax Exempt and Government Entities Division). For further information regarding this notice, please contact the Employee Plans' taxpayer assistance telephone service at (202) 622-6074/6075 (not toll-free) between the hours of 1:30 and 3:30 p.m. Eastern Time, Monday through Thursday.

Part IV. Items of General Interest

Submission of Information to the Office of Tax Shelter Analysis

Announcement 2000–55

In Announcement 2000–12, 2000–12 I.R.B. 835, the Internal Revenue Service announced the formation of the Office of Tax Shelter Analysis, to serve as a clearinghouse for information that comes to the attention of the Service relating to potentially improper tax shelter activity by corporate and noncorporate taxpayers. That announcement provided a mailing address to be used by persons who wish to submit information to the Office of Tax Shelter Analysis relating to particular tax shelter transactions and indicated that a telephone number and e-mail address for the office would be announced thereafter.

Persons wishing to submit information to the Office of Tax Shelter Analysis relating to tax shelter transactions and activities may do so via mail, telephone, fax, or e-mail, as follows:

Mailing address:	Internal Revenue Service LM:PFTG Office of Tax Shelter Analysis 1111 Constitution Avenue, NW Washington, DC 20224
Telephone number:	(202) 283-8740
Fax number:	(202) 283-8354
E-mail address:	irs.tax.shelter.hotline@irs.gov

The principal author of this announcement is David A. Shulman of the Office of Chief Counsel (Passthroughs and Special Industries). For further information regarding this announcement contact Mr. Shulman at (202) 622-3080 (not a toll-free call).

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as "rulings") that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the new ruling holds that it applies to both A and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in law or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in the new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the new ruling does more than restate the substance of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C.—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.
E.O.—Executive Order.
ER—Employer.
ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contribution Act.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
F.R.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign Corporation.
G.C.M.—Chief Counsel's Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.
PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.
PRS—Partnership.
PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statements of Procedral Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

Numerical Finding List[1]

Bulletins 2000–1 through 2000–24

[1] A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 1999–27 through 1999–52 is in Internal Revenue Bulletin 2000–1, dated January 3, 2000.

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99–50
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Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

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Announcement 2000–47, 2000–21 I.R.B. *1118*

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97–19
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98–22
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98–52
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98–61
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Rev. Proc. 2000–15, 2000–5 I.R.B. *447*

99–8
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2000–4
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Announcement 2000–9, 2000–9 I.R.B. *733*

Proposed Regulations:

REG–209601–92
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REG–100276–97
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Announcement 2000–38, 2000–16 I.R.B. *948*

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90–21
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Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

91–66
Superseded by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

92–13
Modified, amplified, and superseded by
Rev. Proc. 2000–11, 2000–3 I.R.B. *309*

92–13A
Modified, amplified, and superseded by
Rev. Proc. 2000–11, 2000–3 I.R.B. *309*

92–41
Superseded by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

93–9
Superseded by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

93–10
Superseded by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

94–12
Modified, amplified, and superseded by
Rev. Proc. 2000–11, 2000–3 I.R.B. *309*

95–42
Superseded by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

96–13
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Rev. Proc. 2000–1, 2000–1 I.R.B. *4*

98–22
Modified and superseded by
Rev. Proc. 2000–16, 2000–6 I.R.B. *518*

98–27
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Rev. Proc. 2000–12, 2000–4 I.R.B. *387*

98–64
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Rev. Proc. 2000–9, 2000–2 I.R.B. *280*

98–65
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Rev. Proc. 2000–19, 2000–12 I.R.B. *785*

99–1
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Rev. Proc. 2000–1, 2000–1 I.R.B. *4*

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Rev. Proc. 2000–3, 2000–1 I.R.B. *103*

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Rev. Proc. 2000–8, 2000–1 I.R.B. *230*

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99–20
Supplemented by
Rev. Proc. 2000–14, 2000–18 I.R.B. *960*

99–22
Obsoleted by
(except as provided in section 5.02 of)
Rev. Proc. 2000–21, 2000–19 I.R.B. *971*

99–24
Superseded by
Rev. Proc. 2000–23, 2000–21 I.R.B. *1018*

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Superseded by
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Superseded by
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99–31
Modified and superseded by
Rev. Proc. 2000–16, 2000–6 I.R.B. *518*

99–49
Modified and amplified by
Rev. Rul. 2000–4, 2000–4 I.R.B. *331*
Rev. Rul. 2000–7, 2000–9 I.R.B. *712*
Notice 2000–4, 2000–3 I.R.B. *313*

99–51
Superseded by
Rev. Proc. 2000–3, 2000–1 I.R.B. *103*

2000–6
Modified by
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

2000–8
Modified by
Rev. Proc. 2000–16, 2000–6 I.R.B. *518*
Rev. Proc. 2000–20, 2000–6 I.R.B. *553*

[1] A cumulative list of current actions on previously published items in Internal Revenue Bulletins 1999–27 through 1999–52 is in Internal Revenue Bulletin 2000–1, dated January 3, 2000.

INTERNAL REVENUE BULLETIN

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If you have comments concerning the format or production of the Internal Revenue Bulletin or suggestions for improving it, we would be pleased to hear from you. You can e-mail us your suggestions or comments through the IRS Internet Home Page (www.irs.gov) or write to the IRS Bulletin Unit, OP:FS:FP:P:1, Room 5617, 1111 Constitution Avenue NW, Washington, DC 20224.

Internal Revenue Service

Washington, DC 20224