

INTERNAL REVENUE SERVICE



CC:PSI:1-COR-121837-00

Nov 30, 2000

Number: **INFO 2000-0414**
Release Date: 12/29/2000

UILC 1362.00-00

Re: EIN: 71-0118110



We are responding to your correspondence regarding [REDACTED] and its request for late S corporation relief. The taxpayer is precluded from automatic relief under Rev. Proc. 97-48. However, if it meets the eligibility requirements for relief under Rev. Proc. 98-55, an election may be submitted for consideration by the Memphis Service Center before March 15, 2001.

Please keep this letter with your client's tax records and provide a copy of it to the taxpayer. We hope that the above information proves helpful.

Sincerely yours,

/s/ Dianna K. Miosi

DIANNA K. MIOSI
Chief, Branch 1
Associate Chief Counsel
(Passthroughs and Special Industries)

Enclosures:
Form 2553 and Instructions
Rev. Proc. 98-55