

IRM PROCEDURAL UPDATE

DATE: 10/13/2026

NUMBER: sbse-20-1026-0847

SUBJECT: Notice 2025-55 and Notice 2026-52, Relief From Penalty for Failure to Deposit Remittance Transfer Excise Tax

AFFECTED IRM(s)/SUBSECTION(s): 20.1.4

CHANGE(s):

IRM 20.1.4.26.4 Added subsection to incorporate Notice 2026-52, Extension of Relief from Penalty for Failure to Deposit Remittance Excise Tax.

Notice 2025-55 and Notice 2026-52, Relief from Penalty for Failure to Deposit Remittance Transfer Excise Tax

(1) Notice 2025-55 provides temporary relief regarding the failure to deposit (FTD) penalties imposed by IRC 6656 as those penalties relate to the remittance transfer excise tax imposed by IRC 4475. Notice 2026-52 modifies and amplifies Notice 2025-55 by extending this transitional relief to semimonthly periods ending before the applicability date of final regulations issued under IRC 4475.

(2) For semimonthly periods ending before the applicability date of final regulations issued under IRC 4475, a remittance transfer provider will be considered to have established reasonable cause for purposes of the IRC 6656 FTD penalty if the provider timely deposits the applicable remittance transfer tax, even if the deposit amount is computed incorrectly, and pays any quarterly underpayment in full by the due date of Form 720, Quarterly Federal Excise Tax Return, for that quarter.

(3) In addition, a remittance transfer provider's eligibility to use the deposit safe harbor under Treas. Reg. § 40.6302(c)-1(b)(2) will not be affected by a failure to make required remittance transfer tax deposits for semimonthly periods ending before the applicability date of the final regulations, provided the provider satisfies the reasonable cause requirements in paragraph (2).

(4) During return processing, the total IRC 4475 tax reported on a return will be recorded as abstract number 155 listed as ABST-NUM on command code TXMODA, IRS NO on command code BMFOLR, and NUM on command code BRTVU.

(5) The FTD penalty will need to be computed manually by calculating the required installment amounts without regard to the remittance transfer excise tax imposed by IRC 4475.