

Part III – Administrative, Procedural, and Miscellaneous

Public Comment Invited on Recommendations for 2006-2007 Guidance Priority List

Notice 2006-36

The Department of Treasury and Internal Revenue Service invite public comment on recommendations for items that should be included on the 2006-2007 Guidance Priority List.

Treasury's Office of Tax Policy and the Service use the Guidance Priority List each year to identify and prioritize the tax issues that should be addressed through regulations, revenue rulings, revenue procedures, notices, and other published administrative guidance. The 2006-2007 Guidance Priority List will establish the guidance that the Treasury Department and the Service intend to issue from July 1, 2006, through June 30, 2007. The Treasury Department and the Service recognize the importance of public input to formulate a Guidance Priority List that focuses resources on guidance items that are most important to taxpayers and tax administration.

As is the case whenever significant legislation is enacted, the Treasury Department and the Service have dedicated substantial resources during the previous (2004-2005) and current plan years to published guidance projects necessary to implement the provisions of the American Jobs Creation Act of 2004, Pub. L. No. 108-357, 118 Stat. 1418, which was enacted on October 22, 2004. Similarly, the Treasury Department and the Service have devoted resources to published guidance projects necessary to

implement the provisions of additional tax legislation that has been enacted during the current plan year, such as the Energy Policy Act of 2005, Pub. L. No. 109-58, 119 Stat. 594, which was enacted on August 8, 2005; the Katrina Emergency Tax Relief Act of 2005, Pub. L. No. 109-73, 119 Stat. 2016, which was enacted on September 23, 2005; and the Gulf Opportunity Zone Act of 2005, Pub. L. No. 109-135, 119 Stat. 2577, which was enacted on December 21, 2005. The Treasury Department and the Service will continue to evaluate the priority of each guidance project in light of the above-mentioned tax legislation and other developments occurring during the 2006-2007 plan year.

In reviewing recommendations and selecting projects for inclusion on the 2006-2007 Guidance Priority List, the Treasury Department and the Service will consider the following:

1. Whether the recommended guidance resolves significant issues relevant to many taxpayers;
2. Whether the recommended guidance promotes sound tax administration;
3. Whether the recommended guidance can be drafted in a manner that will enable taxpayers to easily understand and apply the guidance;
4. Whether the Service can administer the recommended guidance on a uniform basis;
and
5. Whether the recommended guidance reduces controversy and lessens the burden on taxpayers or the Service.

Taxpayers may submit recommendations for guidance at any time during the year. Please submit recommendations by May 15, 2006, for possible inclusion on the original

2006-2007 Guidance Priority List. The Service plans to update the 2006-2007 Guidance Priority List periodically to reflect additional guidance that the Treasury Department and the Service intend to publish during the plan year. The periodic updates allow the Treasury Department and the Service to respond to the need for additional guidance that may arise during the plan year. Recommendations for guidance received after May 15, 2006, will be reviewed for inclusion in the next periodic update.

Taxpayers are not required to submit recommendations for guidance in any particular format. Taxpayers should, however, briefly describe the recommended guidance and explain the need for the guidance. In addition, taxpayers may include an analysis of how the issue should be resolved. It would be helpful if taxpayers suggesting more than one guidance project would prioritize the projects by order of importance. If a large number of projects are being suggested, it also would be helpful if the projects were grouped in terms of high, medium or low priority.

Taxpayers should send written comments to:

Internal Revenue Service
Attn: CC:PA:LPD:PR (Notice 2006-36)
Room 5203
P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20044

or hand deliver comments Monday through Friday between the hours of 8 a.m. and 4 p.m. to:

Courier's Desk
Internal Revenue Service
Attn: CC:PA:LPD:PR (Notice 2006-36)
1111 Constitution Avenue, N.W.
Washington, D.C. 20224

Alternatively, taxpayers may submit comments electronically via e-mail to the following address: Notice.Comments@irsounsel.treas.gov. Taxpayers should include "Notice 2006-36" in the subject line. All comments will be available for public inspection and copying in their entirety.

For further information regarding this notice, contact Crystal Foster of the Office of Associate Chief Counsel (Procedure and Administration) at (202) 622-7198 (not a toll-free call).