

Administrative, Procedural, and Miscellaneous

26 CFR 601.201: Rulings and determination letters.
(Also Part II, § 1014)

Rev. Proc. 2015-37

SECTION 1. PURPOSE

This revenue procedure amplifies Rev. Proc. 2015-3, 2015-1 I.R.B. 129, which sets forth areas of the Internal Revenue Code in which the Internal Revenue Service will not issue letter rulings or determination letters.

SECTION 2. BACKGROUND

Section 5 of Rev. Proc. 2015-3 sets forth a list of those areas of the Internal Revenue Code under the jurisdiction of the Associate Chief Counsel (Corporate), the Associate Chief Counsel (Financial Institutions and Products), the Associate Chief Counsel (Income Tax and Accounting), the Associate Chief Counsel (Passthroughs and Special Industries), the Associate Chief Counsel (Procedure and Administration), and the Associate Chief Counsel (Tax Exempt and Government Entities) relating to issues on which the Internal Revenue Service will not issue letter rulings or determination letters until the Service resolves the issue through publication of a revenue ruling, a revenue

procedure, regulations, or otherwise.

SECTION 3. PROCEDURE

Rev. Proc. 2015-3 is amplified by adding the following to section 5.01: Section 1014.

Basis of Property Acquired from a Decedent. Whether the assets in a grantor trust receive a section 1014 basis adjustment at the death of the deemed owner of the trust for income tax purposes when those assets are not includible in the gross estate of that owner under chapter 11 of subtitle B of the Internal Revenue Code.

SECTION 4. EFFECT ON OTHER DOCUMENTS

Rev. Proc. 2015-3 is amplified.

SECTION 5. EFFECTIVE DATE

This revenue procedure is effective for all requests received after June 15, 2015.

SECTION 6. DRAFTING INFORMATION

The principal author of this revenue procedure is Meghan Howard of the Office of Associate Chief Counsel (Passthroughs and Special Industries). For further information regarding this revenue procedure, please contact Ms. Howard at 202-317-5055 (not a toll-free call).