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

Federal rates; adjusted federal rates; adjusted federal long-term rate and the long-term exempt rate. For purposes of sections 382, 642, 1274, 1288, and other sections of the Code, tables set forth the rates for March 2010.


EXEMPT ORGANIZATIONS

The IRS has revoked its determination that the Remembrance Foundation of Alpine, UT, qualifies as an organization described in sections 501(c)(3) and 170(c)(2) of the Code.

ADMINISTRATIVE

This notice sets forth the maximum face amount of Qualified Zone Academy Bonds (“QZABs”) that may be issued for each state for the calendar year 2010 under section 54E(c)(2) of the Code. For this purpose, “state” includes the District of Columbia and the possessions of the United States.

Finding Lists begin on page ii.
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 compiled 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:

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 Other Related Items, 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 last 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 last Bulletin of each semiannual period.

The contents of this publication are not copyrighted and may be reprinted freely. A citation of the Internal Revenue Bulletin as the source would be appropriate.

Section 42.—Low-Income Housing Credit

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 280G.—Golden Parachute Payments


Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-In Losses Following Ownership Change

The adjusted applicable federal long-term rate is set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 412.—Minimum Funding Standards

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 467.—Certain Payments for the Use of Property or Services

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 468.—Special Rules for Mining and Solid Waste Reclamation and Closing Costs

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 482.—Allocation of Income and Deductions Among Taxpayers


Section 483.—Interest on Certain Deferred Payments

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 484.—Interest on Certain Deferred Payments

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 642.—Special Rules for Credits and Deductions


Section 807.—Rules for Certain Reserves

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 846.—Discounted Unpaid Losses Defined

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 1274.—Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 412, 467, 468, 482, 483, 642, 807, 846, 1288, 7520, 7872.)

Federal rates; adjusted federal rates; adjusted federal long-term rate and the long-term exempt rate. For purposes of sections 382, 642, 1274, 1288, and other sections of the Code, tables set forth the rates for March 2010.

Rev. Rul. 2010–8

This revenue ruling provides various prescribed rates for federal income tax purposes for March 2010 (the current month). Table 1 contains the short-term, mid-term, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, mid-term, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, and before December 31, 2013, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.
### REV. RUL. 2010–8 TABLE 1
Applicable Federal Rates (AFR) for March 2010

<table>
<thead>
<tr>
<th>Period for Compounding</th>
<th>Annual</th>
<th>Semiannual</th>
<th>Quarterly</th>
<th>Monthly</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Short-term</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>.64%</td>
<td>.64%</td>
<td>.64%</td>
<td>.64%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>.70%</td>
<td>.70%</td>
<td>.70%</td>
<td>.70%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>.77%</td>
<td>.77%</td>
<td>.77%</td>
<td>.77%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>.83%</td>
<td>.83%</td>
<td>.83%</td>
<td>.83%</td>
</tr>
<tr>
<td><strong>Mid-term</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>2.69%</td>
<td>2.67%</td>
<td>2.66%</td>
<td>2.66%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>2.96%</td>
<td>2.94%</td>
<td>2.93%</td>
<td>2.92%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>3.23%</td>
<td>3.20%</td>
<td>3.19%</td>
<td>3.18%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>3.50%</td>
<td>3.47%</td>
<td>3.46%</td>
<td>3.45%</td>
</tr>
<tr>
<td>150% AFR</td>
<td>4.05%</td>
<td>4.01%</td>
<td>3.99%</td>
<td>3.98%</td>
</tr>
<tr>
<td>175% AFR</td>
<td>4.72%</td>
<td>4.67%</td>
<td>4.64%</td>
<td>4.63%</td>
</tr>
<tr>
<td><strong>Long-term</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>4.35%</td>
<td>4.30%</td>
<td>4.28%</td>
<td>4.26%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>4.79%</td>
<td>4.73%</td>
<td>4.70%</td>
<td>4.68%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>5.23%</td>
<td>5.16%</td>
<td>5.13%</td>
<td>5.11%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>5.67%</td>
<td>5.59%</td>
<td>5.55%</td>
<td>5.53%</td>
</tr>
</tbody>
</table>

### REV. RUL. 2010–8 TABLE 2
Adjusted AFR for March 2010

<table>
<thead>
<tr>
<th>Period for Compounding</th>
<th>Annual</th>
<th>Semiannual</th>
<th>Quarterly</th>
<th>Monthly</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Short-term adjusted</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>.64%</td>
<td>.64%</td>
<td>.64%</td>
<td>.64%</td>
</tr>
<tr>
<td><strong>Mid-term adjusted</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>1.86%</td>
<td>1.85%</td>
<td>1.85%</td>
<td>1.84%</td>
</tr>
<tr>
<td><strong>Long-term adjusted</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFR</td>
<td>4.03%</td>
<td>3.99%</td>
<td>3.97%</td>
<td>3.96%</td>
</tr>
</tbody>
</table>

### REV. RUL. 2010–8 TABLE 3
Rates Under Section 382 for March 2010

- Adjusted federal long-term rate for the current month: 4.03%
- Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months): 4.03%

### REV. RUL. 2010–8 TABLE 4
Appropriate Percentages Under Section 42(b)(1) for March 2010

- Appropriate percentage for the 70% present value low-income housing credit: 7.81%
- Appropriate percentage for the 30% present value low-income housing credit: 3.35%
Rate Under Section 7520 for March 2010

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest

3.2%

Section 1288.—Treatment of Original Issue Discount on Tax-Exempt Obligations

The adjusted applicable federal short-term, midterm, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 7520.—Valuation Tables

The adjusted applicable federal short-term, midterm, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.

Section 7872.—Treatment of Loans With Below-Market Interest Rates

The adjusted applicable federal short-term, midterm, and long-term rates are set forth for the month of March 2010. See Rev. Rul. 2010-8, page 432.
Qualified Zone Academy Bond Allocations for 2010

Notice 2010–22

SECTION 1. PURPOSE

This notice sets forth the maximum face amount of Qualified Zone Academy Bonds (“QZABs”) that may be issued for each State for the calendar year 2010 under § 54E(c)(2) of the Internal Revenue Code. Under § 54A(e)(3), the term State includes the District of Columbia and any possession of the United States. This notice also provides certain interim guidance for QZABs issued after October 3, 2008.

SECTION 2. BACKGROUND

.01 INTRODUCTION

Section 313 of the Tax Extenders and Alternative Minimum Tax Relief Act of 2008, Div. C of Pub. L. No. 110–343, 122 Stat. 3765 (2008) (“Act”) added new § 54E, which provides revised program provisions for QZABs in lieu of the existing provisions under § 1397E, effective for obligations issued after October 3, 2008. The Act amended § 54A(d)(1) to provide that the term qualified tax credit bond (“QTCB”) means, in part, a qualified zone academy bond which is part of an issue that meets the requirements of §§ 54A(d)(2), (3), (4), (5), and (6) regarding expenditures of bond proceeds, information reporting, arbitrage, maturity limitations, and prohibitions against financial conflicts of interest. The Act also amended § 54A(d)(2)(C) to provide that, for purposes of § 54A(d)(2), the term “qualified purpose” for a QZAB means a purpose specified in § 54E(a)(1), described below.

The Act added § 54E(c)(1) to provide that, for purposes of § 54A(d)(2), the term “qualified zone academy bond” means any bond issued as part of an issue if: (1) 100 percent of the available project proceeds of such issue are to be used for a qualified purpose with respect to a qualified zone academy established by an eligible local education agency; (2) the bond is issued by a State or local government within the jurisdiction of which such academy is located; and (3) the issuer: (A) designates such bond for purposes of this section; (B) certifies that it has written assurances that the private business contribution requirement of § 54E(b) will be met; and, (C) certifies that it has the written approval of the eligible local education agency for such bond issuance.

Section 54E(d)(3) provides that a qualified purpose with respect to each academy means: (A) rehabilitating or repairing the public school facility; (B) providing equipment; (C) developing course materials; and, (D) training teachers and other school personnel. The private business contribution requirement of § 54E(b) is met if the eligible local education agency that established the qualified zone academy has written commitments from private entities to make qualified contributions having a present value (as of the date of issuance of the issue) of not less than 10 percent of the proceeds of the issue. Section 54E(d)(4) defines “qualified contributions” as any contribution (of a type and quality acceptable to the eligible local education agency) of: (A) equipment for use in the qualified zone academy (including state-of-the-art technology and vocational equipment); (B) technical assistance in developing curriculum or in training teachers to promote appropriate market driven technology in the classroom; (C) employees’ services as volunteer mentors; (D) internships, field trips, or other educational opportunities outside the academy; or (E) any other property or service specified by the eligible education agency.

Section 54E(c)(2) provides that the Department of the Treasury shall allocate the national zone academy bond limitation among the States on the basis of their respective populations of individuals below the poverty line (as defined by the Office of Management and Budget). The limitation amount allocated to a State under the preceding sentence shall be allocated by the State education agency to qualified zone academies within such State.

Under § 54E(c)(3), the maximum aggregate face amount of bonds issued during any calendar year which may be designated as QZABs with respect to any qualified zone academy shall not exceed the limitation amount allocated to such academy for such calendar year. However, under § 54E(c)(4)(A), if for any calendar year the limitation amount for any State exceeds the amount of bonds issued during such year which are designated QZABs with respect to qualified zone academies within such State, the limitation amount for such State for the following calendar year shall be increased by the amount of such excess. Under § 54E(c)(4)(B), however, any carryforward of a limitation...
amount may be carried only to the first 2 years following the unused limitation year. For these purposes, the limitation amount shall be treated as used on a first-in first-out basis.

Section 54E(c)(4)(C) applies the rules under §§ 54E(c)(4)(A) and (B) to QZABs issued after October 3, 2008, under a carryforward of an unused limitation to calendar years 2008 or 2009 that initially arose in a prior year under § 1397E(e)(4). Any such carryforward is treated as though it were a carryforward that initially arose under § 54E in that prior year.

Sections 1.1397–1 (the “Final Regulations”) and 1.1397–1T (the “Temporary Regulations”) set forth regulations that were issued under § 1397E. Except as provided in this notice, or to the extent inconsistent with §§ 54A and 54E, the Final Regulations and the Temporary Regulations apply to QZABs issued under §§ 54A and 54E.

SECTION 3. INTERIM GUIDANCE AND RELIANCE

.01 GENERALLY

Pending the promulgation and effective date of future administrative or regulatory guidance, taxpayers may rely on the interim guidance provided in this notice and, to the extent not inconsistent with this notice and the provisions of §§ 54A and 54E, the existing regulations issued under § 1397E.

.02. CREDIT RATE

For QZABs issued under §§ 54A and 54E, the maximum maturity and the credit rate are determined as of the date that there is a binding, written contract for the sale or exchange of the bond. The applicable maximum maturity and the QZAB credit rate are published for that date by the Bureau of Public Debt on its Internet site for State and Local Government Series securities at: http://www.treasurydirect.gov. For further information regarding the methodology and procedures that the Treasury Department uses to determine these credit rates, see Notice 2009–15, 2009–6 I.R.B. 449 (February 9, 2009).

.03 SINKING FUND YIELD

Section 54A(d)(4)(C) provides that an issue shall not be treated as failing to meet the requirements of § 148 by reason of any fund which is expected to be used to repay the issue if: (i) the fund is funded at a rate not more rapid than equal annual installments; (ii) the fund is funded in a manner reasonably expected to result in an amount not greater than an amount necessary to repay the issue; and (iii) the yield on such fund is not greater than the discount rate determined under § 54A(d)(5)(B) (the “permitted sinking fund yield”).

The permitted sinking fund yield is determined under § 54A(d)(5)(B) by using a rate equal to 110 percent of the long-term adjusted, applicable federal rate (“AFR”), compounded semiannually, for the month in which the bond is sold. The IRS publishes the long-term adjusted AFR, compounded semiannually, each month in a revenue ruling that is published in the Internal Revenue Bulletin. The Bureau of Public Debt publishes the permitted sinking fund yield for each month on its Internet site for State and Local Government Series securities at https://www.treasurydirect.gov.

SECTION 4. NATIONAL ZONE ACADEMY BOND LIMITATION FOR 2010

The national limitation for QZABs issued under § 54E for calendar year 2010 is $1.4 billion. This amount is allocated among the States as follows:

Qualified Zone Academy Bond Allocations by State or Territory, 2010

<table>
<thead>
<tr>
<th>State or Territory</th>
<th>QZAB Allocation (in dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>24,649,000</td>
</tr>
<tr>
<td>Alaska</td>
<td>2,113,000</td>
</tr>
<tr>
<td>Arizona</td>
<td>31,935,000</td>
</tr>
<tr>
<td>Arkansas</td>
<td>16,361,000</td>
</tr>
<tr>
<td>California</td>
<td>163,260,000</td>
</tr>
<tr>
<td>Colorado</td>
<td>18,468,000</td>
</tr>
<tr>
<td>Connecticut</td>
<td>10,533,000</td>
</tr>
<tr>
<td>Delaware</td>
<td>3,004,000</td>
</tr>
<tr>
<td>DC</td>
<td>3,252,000</td>
</tr>
<tr>
<td>Florida</td>
<td>81,105,000</td>
</tr>
<tr>
<td>Georgia</td>
<td>47,428,000</td>
</tr>
<tr>
<td>Hawaiii</td>
<td>3,982,000</td>
</tr>
<tr>
<td>Idaho</td>
<td>6,352,000</td>
</tr>
<tr>
<td>Illinois</td>
<td>52,218,000</td>
</tr>
<tr>
<td>Indiana</td>
<td>27,302,000</td>
</tr>
<tr>
<td>Iowa</td>
<td>11,304,000</td>
</tr>
<tr>
<td>Kansas</td>
<td>10,510,000</td>
</tr>
<tr>
<td>Kentucky</td>
<td>24,481,000</td>
</tr>
<tr>
<td>Louisiana</td>
<td>25,786,000</td>
</tr>
<tr>
<td>Maine</td>
<td>5,503,000</td>
</tr>
<tr>
<td>Maryland</td>
<td>15,324,000</td>
</tr>
</tbody>
</table>

2010–10 I.R.B. 436 March 8, 2010
<table>
<thead>
<tr>
<th>State or Territory</th>
<th>QZAB Allocation (in dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Massachusetts</td>
<td>21,586,000</td>
</tr>
<tr>
<td>Michigan</td>
<td>47,898,000</td>
</tr>
<tr>
<td>Minnesota</td>
<td>16,722,000</td>
</tr>
<tr>
<td>Mississippi</td>
<td>20,163,000</td>
</tr>
<tr>
<td>Missouri</td>
<td>26,461,000</td>
</tr>
<tr>
<td>Montana</td>
<td>4,540,000</td>
</tr>
<tr>
<td>Nebraska</td>
<td>6,368,000</td>
</tr>
<tr>
<td>Nevada</td>
<td>9,846,000</td>
</tr>
<tr>
<td>New Hampshire</td>
<td>3,413,000</td>
</tr>
<tr>
<td>New Jersey</td>
<td>25,271,000</td>
</tr>
<tr>
<td>New Mexico</td>
<td>11,263,000</td>
</tr>
<tr>
<td>New York</td>
<td>88,638,000</td>
</tr>
<tr>
<td>North Carolina</td>
<td>44,454,000</td>
</tr>
<tr>
<td>North Dakota</td>
<td>2,413,000</td>
</tr>
<tr>
<td>Ohio</td>
<td>50,855,000</td>
</tr>
<tr>
<td>Oklahoma</td>
<td>18,925,000</td>
</tr>
<tr>
<td>Oregon</td>
<td>17,124,000</td>
</tr>
<tr>
<td>Pennsylvania</td>
<td>49,657,000</td>
</tr>
<tr>
<td>Rhode Island</td>
<td>4,172,000</td>
</tr>
<tr>
<td>South Carolina</td>
<td>23,224,000</td>
</tr>
<tr>
<td>South Dakota</td>
<td>3,355,000</td>
</tr>
<tr>
<td>Tennessee</td>
<td>32,065,000</td>
</tr>
<tr>
<td>Texas</td>
<td>128,252,000</td>
</tr>
<tr>
<td>Utah</td>
<td>8,931,000</td>
</tr>
<tr>
<td>Vermont</td>
<td>2,134,000</td>
</tr>
<tr>
<td>Virginia</td>
<td>26,185,000</td>
</tr>
<tr>
<td>Washington</td>
<td>24,830,000</td>
</tr>
<tr>
<td>West Virginia</td>
<td>10,519,000</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>19,585,000</td>
</tr>
<tr>
<td>Wyoming</td>
<td>1,689,000</td>
</tr>
<tr>
<td>American Samoa</td>
<td>1,351,000</td>
</tr>
<tr>
<td>Guam</td>
<td>1,379,000</td>
</tr>
<tr>
<td>Northern Mariana Islands</td>
<td>868,000</td>
</tr>
<tr>
<td>Puerto Rico</td>
<td>59,775,000</td>
</tr>
<tr>
<td>Virgin Islands</td>
<td>1,219,000</td>
</tr>
<tr>
<td>Total Allocation</td>
<td>1,400,000,000</td>
</tr>
</tbody>
</table>

**SECTION 5. EFFECTIVE DATE OF NATIONAL ZONE ACADEMY BOND LIMITATIONS**

The national limitation allocated in section 4 is effective for QZABs issued on or after January 1, 2010.

**SECTION 6. DRAFTING INFORMATION**

The principal authors of this notice are Timothy L. Jones and David E. White of the Office of Associate Chief Counsel (Financial Institutions and Products). For further information regarding this notice, contact David E. White or Timothy L. Jones at (202) 622–3980 (not a toll-free call).
Part IV. Items of General Interest


Announcement 2010–11


The Revenue Procedure incorrectly stated:

“Taxpayers that use the composite method of Notice 88–100 should use 94.3133 percent to discount unpaid losses incurred in this [the Reinsurance (Nonproportional Assumed Property)] line of business in 2009 and prior years and that are outstanding at the end of the 2019 taxable year.”

For further information regarding this announcement, contact Sarah E. Swan at (202) 622–8443 (not a toll-free call).

Deletions From Cumulative List of Organizations Contributions to Which are Deductible Under Section 170 of the Code

Announcement 2010–15

The Internal Revenue Service has revoked its determination that the organizations listed below qualify as organizations described in sections 501(c)(3) and 170(c)(2) of the Internal Revenue Code of 1986.

Generally, the Service will not disallow deductions for contributions made to a listed organization on or before the date of announcement in the Internal Revenue Bulletin that an organization no longer qualifies. However, the Service is not precluded from disallowing a deduction for any contributions made after an organization ceases to qualify under section 170(c)(2) if the organization has not timely filed a suit for declaratory judgment under section 7428 and if the contributor (1) had knowledge of the revocation of the ruling or determination letter, (2) was aware that such revocation was imminent, or (3) was in part responsible for or was aware of the activities or omissions of the organization that brought about this revocation.

If on the other hand a suit for declaratory judgment has been timely filed, contributions from individuals and organizations described in section 170(c)(2) that are otherwise allowable will continue to be deductible. Protection under section 7428(c) would begin on March 8, 2010 and would end on the date the court first determines that the organization is not described in section 170(c)(2) as more particularly set forth in section 7428(c)(1). For individual contributors, the maximum deduction protected is $1,000, with a husband and wife treated as one contributor. This benefit is not extended to any individual, in whole or in part, for the acts or omissions of the organization that were the basis for revocation.

Remembrance Foundation
Alpine, UT
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 laws 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 a 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 rulings, 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.
CI—City.
COP—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.
EO—Executive Order.
ER—Employer.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
FR—Federal Register.
FX—Foreign corporation.
G.C.M.—Chief Counsel’s Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
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.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
X—Corporation.
Y—Corporation.
Z—Corporation.
Numerical Finding List

Bulletins 2010–1 through 2010–10

Announcements:

2010-1, 2010-4 I.R.B. 333
2010-2, 2010-2 I.R.B. 271
2010-3, 2010-4 I.R.B. 333
2010-4, 2010-5 I.R.B. 384
2010-5, 2010-6 I.R.B. 402
2010-6, 2010-6 I.R.B. 402
2010-7, 2010-6 I.R.B. 403
2010-8, 2010-7 I.R.B. 408
2010-9, 2010-7 I.R.B. 410
2010-10, 2010-7 I.R.B. 410
2010-11, 2010-7 I.R.B. 438
2010-12, 2010-7 I.R.B. 410
2010-13, 2010-8 I.R.B. 426
2010-15, 2010-10 I.R.B. 438

Notices:

2010-1, 2010-2 I.R.B. 251
2010-2, 2010-2 I.R.B. 251
2010-3, 2010-2 I.R.B. 253
2010-4, 2010-2 I.R.B. 253
2010-5, 2010-2 I.R.B. 256
2010-6, 2010-3 I.R.B. 275
2010-7, 2010-3 I.R.B. 296
2010-8, 2010-3 I.R.B. 297
2010-9, 2010-3 I.R.B. 298
2010-10, 2010-3 I.R.B. 299
2010-11, 2010-4 I.R.B. 326
2010-12, 2010-4 I.R.B. 326
2010-13, 2010-4 I.R.B. 327
2010-14, 2010-5 I.R.B. 344
2010-15, 2010-6 I.R.B. 390
2010-16, 2010-6 I.R.B. 396
2010-19, 2010-7 I.R.B. 404
2010-20, 2010-8 I.R.B. 422
2010-22, 2010-10 I.R.B. 435

Proposed Regulations:

REG-132232-08, 2010-6 I.R.B. 401
REG-137036-08, 2010-6 I.R.B. 398
REG-101896-09, 2010-5 I.R.B. 347
REG-131028-09, 2010-4 I.R.B. 332

Revenue Procedures—Continued:

2010-9, 2010-2 I.R.B. 258
2010-10, 2010-3 I.R.B. 300
2010-11, 2010-2 I.R.B. 269
2010-12, 2010-3 I.R.B. 302
2010-13, 2010-4 I.R.B. 329
2010-15, 2010-7 I.R.B. 404
2010-17, 2010-8 I.R.B. 425
2010-18, 2010-9 I.R.B. 451

Revenue Rulings:

2010-1, 2010-2 I.R.B. 248
2010-2, 2010-3 I.R.B. 272
2010-3, 2010-3 I.R.B. 272
2010-4, 2010-4 I.R.B. 309
2010-5, 2010-4 I.R.B. 312
2010-6, 2010-6 I.R.B. 387
2010-7, 2010-8 I.R.B. 417
2010-8, 2010-10 I.R.B. 432

Treasury Decisions:

9474, 2010-4 I.R.B. 322
9475, 2010-4 I.R.B. 304
9476, 2010-5 I.R.B. 336
9477, 2010-6 I.R.B. 385
9478, 2010-4 I.R.B. 315

1 A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2009–27 through 2009–52 is in Internal Revenue Bulletin 2009–52, dated December 28, 2009.
Finding List of Current Actions on Previously Published Items

Bulletins 2010–1 through 2010–10

Announcements:

2010-4
Corrected by Ann. 2010-10, 2010-7 I.R.B.

Notices:

2005-88
Superseded by Notice 2010-13, 2010-4 I.R.B. 327

2008-41
Modified by Notice 2010-7, 2010-3 I.R.B. 296

2008-55
Modified by Notice 2010-3, 2010-2 I.R.B. 253

2008-88
Modified by Notice 2010-7, 2010-3 I.R.B. 296

2008-113
Modified by Notice 2010-6, 2010-3 I.R.B. 275

2008-115
Modified by Notice 2010-6, 2010-3 I.R.B. 275

2009-11
Amplified by Notice 2010-9, 2010-3 I.R.B. 298

2009-13
Obsoleted by T.D. 9478, 2010-4 I.R.B. 315
REG-131028-09, 2010-4 I.R.B. 332

2009-38
Amplified and superseded by Notice 2010-2, 2010-2 I.R.B. 251

Proposed Regulations:

REG-127270-06
Hearing scheduled by Ann. 2010-6, 2010-6 I.R.B. 402

Revenue Procedures:

80-59
Modified and superseded by Rev. Proc. 2010-11, 2010-2 I.R.B. 269

87-35

Revenue Procedures—Continued:

2008-14

2008-33

2009-1
Superseded by Rev. Proc. 2010-1, 2010-1 I.R.B. 1

2009-2
Superseded by Rev. Proc. 2010-2, 2010-1 I.R.B. 90

2009-3

2009-4
Superseded by Rev. Proc. 2010-4, 2010-1 I.R.B. 122

2009-5
Superseded by Rev. Proc. 2010-5, 2010-1 I.R.B. 165

2009-6
Superseded by Rev. Proc. 2010-6, 2010-1 I.R.B. 193

2009-7

2009-8
Superseded by Rev. Proc. 2010-8, 2010-1 I.R.B. 234

2009-9

2009-15
Amplified and superseded by Rev. Proc. 2010-12, 2010-3 I.R.B. 302

2009-25

2009-55
Corrected by Ann. 2010-11, 2010-10 I.R.B. 438

2010-1
Corrected by Ann. 2010-5, 2010-6 I.R.B. 402

Revenue Rulings:

67-436
Obsoleted by REG-101896-09, 2010-5 I.R.B. 347

Revenue Rulings—Continued:

92-19

2008-52
Supplemented and superseded by Rev. Rul. 2010-2, 2010-3 I.R.B. 272

Treasury Decisions:

9443
Corrected by Ann. 2010-8, 2010-7 I.R.B. 408

9458
Corrected by Ann. 2010-7, 2010-6 I.R.B. 403

1 A cumulative list of current actions on previously published items in Internal Revenue Bulletins 2009–27 through 2009–52 is in Internal Revenue Bulletin 2009–52, dated December 28, 2009.
## Internal Revenue Cumulative Bulletins
### Publications and Subscription Order Form

**Order Processing Code:** 3465  
**Easy Secure Internet:** bookstore.gpo.gov

### Publications

<table>
<thead>
<tr>
<th>Qty</th>
<th>Stock Number</th>
<th>Title</th>
<th>Price Each</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>048-604-02962-1</td>
<td>Cum. Bulletin 2002-3</td>
<td>54.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>048-604-02962-7</td>
<td>Cum. Bulletin 2003-2 (July-Dec)</td>
<td>54.00</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total for Publications**

### Subscriptions

<table>
<thead>
<tr>
<th>Qty</th>
<th>List ID</th>
<th>Title</th>
<th>Price Each</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>IRS</td>
<td>Internal Revenue Bulletin</td>
<td>$247</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Optional – Add $50 to open Deposit Account</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total for Subscriptions**

**NOTE:** Price includes regular shipping and handling and is subject to change. International customers please add 40 percent.

### Standing Order Service*

To automatically receive future editions of *Internal Revenue Cumulative Bulletins* without having to initiate a new purchase order, sign below for Standing Order Service.

<table>
<thead>
<tr>
<th>Qty</th>
<th>Standing Order</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ZIFSC</td>
<td>Internal Revenue Cumulative Bulletins</td>
</tr>
</tbody>
</table>

**Authorization**

I hereby authorize the Superintendent of Documents to charge my account for Standing Order Service: (enter account information at right)

- [ ] VISA
- [ ] MasterCard
- [ ] Discover/NOVUS
- [ ] American Express

**Superintendent of Documents (SOD) Deposit Account**

**Authorizing signature (Standing orders not valid unless signed).**

Please print or type your name.

**Daytime phone number:**

**SuDocs Deposit Account**

A Deposit Account will enable you to use Standing Order Service to receive subsequent volumes quickly and automatically. For an initial deposit of $50 you can establish your Superintendent of Documents Deposit Account.

- [ ] YES! Open a SOD Deposit Account for me so I can order future publications quickly and easily.
  I am enclosing the $50 initial deposit.

**Check method of payment:**

- [ ] Check payable to Superintendent of Documents
- [ ] SOD Deposit Account
- [ ] VISA
- [ ] MasterCard
- [ ] Discover/NOVUS
- [ ] American Express

American Express **Card Number**

Expiration date

**Thank you for your Order!**

**Authorizing signature:**

**Company or personal name:**

(please type or print)

**Additional address/attention line:**

**Street address:**

**City, State, Zip Code:**

**E-mail address:**

**Daytime phone including area code:**

**Purchase order number (optional):**

---

*Standing Order Service*

Just sign the authorization above to charge selected items to your existing Deposit Account, VISA or MasterCard, Discover/NOVUS, or American Express account. Or open a Deposit Account with an initial deposit of $50 or more. Your account will be charged only as each volume is issued and mailed. Sufficient money must be left in your account to insure that items are shipped. Service begins with the next issue released of each item you select.

You will receive written acknowledgement for each item you choose to receive by Standing Order Service. If you wish to cancel your Standing Order Service, please notify the Superintendent of Documents in writing (telephone cancellations are accepted, but must be followed up with a written cancellation within 10 days).

**Important:** Please include this completed order form with your payment.
INTERNAL REVENUE BULLETIN

The Introduction at the beginning of this issue describes the purpose and content of this publication. The weekly Internal Revenue Bulletin is sold on a yearly subscription basis by the Superintendent of Documents. Current subscribers are notified by the Superintendent of Documents when their subscriptions must be renewed.

CUMULATIVE BULLETINS

The contents of this weekly Bulletin are consolidated semiannually into a permanent, indexed, Cumulative Bulletin. These are sold on a single copy basis and are not included as part of the subscription to the Internal Revenue Bulletin. Subscribers to the weekly Bulletin are notified when copies of the Cumulative Bulletin are available. Certain issues of Cumulative Bulletins are out of print and are not available. Persons desiring available Cumulative Bulletins, which are listed on the reverse, may purchase them from the Superintendent of Documents.

ACCESS THE INTERNAL REVENUE BULLETIN ON THE INTERNET


INTERNAL REVENUE BULLETINS ON CD-ROM

Internal Revenue Bulletins are available annually as part of Publication 1796 (Tax Products CD-ROM). The CD-ROM can be purchased from National Technical Information Service (NTIS) on the Internet at www.irs.gov/cdorders (discount for online orders) or by calling 1-877-233-6767. The first release is available in mid-December and the final release is available in late January.

HOW TO ORDER

Check the publications and/or subscription(s) desired on the reverse, complete the order blank, enclose the proper remittance, detach entire page, and mail to the Superintendent of Documents, P.O. Box 371954, Pittsburgh PA, 15250–7954. Please allow two to six weeks, plus mailing time, for delivery.

WE WELCOME COMMENTS ABOUT THE INTERNAL REVENUE BULLETIN

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 email us your suggestions or comments through the IRS Internet Home Page (www.irs.gov) or write to the IRS Bulletin Unit, SE:W:CAR:MP:T:T:SP, Washington, DC 20224.

Internal Revenue Service
Washington, DC 20224

Official Business
Penalty for Private Use, $300