

# INTERNAL REVENUE BULLETIN



## 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.

**Bulletin No. 2020-5**  
**January 27, 2020**

## EXEMPT ORGANIZATIONS

### **Announcement 2020-1, page 401.**

Revocation of IRC 501(c)(3) Organizations for failure to meet the code section requirements. Contributions made to the organizations by individual donors are no longer deductible under IRC 170(b)(1)(A).

## INCOME TAX

### **REG-125710-18, page 403.**

This document withdraws a portion of a notice of proposed rulemaking published in the Proposed Rules section of the

Federal Register on September 10, 2019. That notice of proposed rulemaking contained proposed rules to provide guidance regarding the items of income and deduction that are included in the calculation of built-in gains and losses under section 382 of the Internal Revenue Code. If adopted, those proposed rules would apply to any ownership change occurring after the date the Treasury decision adopting those proposed rules as a final regulation is published in the Federal Register. This notice of proposed rulemaking would delay the applicability of those proposed rules and provide transition relief for eligible taxpayers.

# The IRS Mission

Provide America's taxpayers top-quality service by helping them understand and meet their tax responsibilities and enforce the 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.

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:

### **Part I.—1986 Code.**

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.

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## Part IV

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

#### Announcement 2020-1

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 IRS 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 IRS 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 January 27, 2020 and would end on the date the court first determines the organization is not described in section 170(c)(2) as more particularly set for 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.

NAME OF ORGANIZATION	Effective Date of Revocation	LOCATION
Cancer Fund of America	1/1/2014	Knoxville, TN
Vipers Basketball Inc	1/1/2016	Carterville, IL
Prep 2 Rise	7/1/2016	Providence, RI
Tsung Sun Social Club Inc	1/1/2015	New York, NY
Aptitunity Corp	1/1/2016	Atlanta, GA
Atlanta Womens Hockey Association Inc	1/1/2016	Alpharetta, GA
Haskell County Community Hospital	8/1/2010	Stigler, OK
The Will to Train	1/1/2015	San Diego, CA
Gamma Chapter Delta Phi Foundation Inc	8/7/2018	Old Bethpage, NY
Magans Light	1/1/2016	Ft. Worth, TX
Sims Chiropractic Ministering Health	1/1/2014	Gunnison, CO
Team Fitnuh Sports Corporation	8/1/2015	Maumelle, AR
Rice Hospital District	4/1/2015	Eagle Lake, TX
Herbert Hoover Boys and Girls Club	1/1/2018	St. Louis, MO
Friendship Fire Company No. 1 of Birdsboro	1/1/2016	Birdsboro, PA
Doctors Charitable Foundation	1/1/2014	San Diego, CA
Fairbanks Outboard Association Inc	1/1/2015	Fairbanks, AK
New Rockford Golf Club	4/1/2014	New Rockford, ND
Rehoboth McKinley Christian Health Care	1/1/2014	Gallup, NM
Moses Hill Cemetery Inc	1/1/2016	Holdrege, NE
Nia Comprehensive Center for Developmental Disabilities Inc	7/1/2013	Chicago, IL
Washington County Hospital Inc	10/1/2015	Plymouth, NC
Michael Patrick Hollins Memorial Foundation	1/1/2016	Mt. Ephraim, NJ
A Positive Progress Service Inc	1/1/2016	Red Springs, NC
Father's Rights Organization	7/1/2014	Toledo, OH

<b>NAME OF ORGANIZATION</b>	<b>Effective Date of Revocation</b>	<b>LOCATION</b>
Walter's Family Foundation	1/1/2015	Tamarac, FL
Teen Leadership Foundation	1/1/2015	Newport Beach, FL
Real Pay It Forward Inc	1/1/2016	Clearwater, FL
New World Sanctuary Foundation	1/1/2016	Ashland, OR
Strength for the Journey Inc	1/1/2015	Hobe Sound, FL
Arizona Bike Week Charities	1/1/2014	Mesa, AZ
Support Our Veterans Inc	1/1/2014	Central Village, CT
Kingdom Victories Outreach Ministries	1/1/2016	Inkster, MI
Light of the World Inc	1/1/2015	Unionville, CT
Turner-Lieder-Tafel Singing Society Inc	7/1/2015	Stamford, CT
Thirty Thousand feet Booster Club	3/21/2014	Travis AFB, CA
American Medical Missionary Care Inc	1/1/2014	Alpharetta, GA
Uplift Individuals in Christ	1/1/2015	Ft. Washington, MD
You Are Loved LLC	1/1/2016	Mandeville, LA
Sigma Theta Tau International Inc	7/1/2014	Mayaguez, PR
Blankie Depot	1/1/2016	Hazlet, NJ
Owners Association of Spring Street	1/1/2016	Houston, TX
Community Worship Church	8/1/2012	Portland, OR
Comitato Trinacria Alcamo-Castellammare-Santa Ninfa Ltd	1/1/2014	Glendale, NY

## Notice of Proposed Rulemaking

### Revised Applicability Dates for Regulations under Section 382(h) Related to Built-in Gain and Loss

#### REG-125710-18

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Partial withdrawal of notice of proposed rulemaking; notice of proposed rulemaking.

SUMMARY: This document withdraws a portion of a notice of proposed rulemaking published in the Proposed Rules section of the **Federal Register** on September 10, 2019. That notice of proposed rulemaking contained proposed rules to provide guidance regarding the items of income and deduction that are included in the calculation of built-in gains and losses under section 382 of the Internal Revenue Code (Code). If adopted, those proposed rules would apply to any ownership change occurring after the date the Treasury decision adopting those proposed rules as a final regulation is published in the **Federal Register**. This notice of proposed rulemaking would delay the applicability of those proposed rules and provide transition relief for eligible taxpayers. The proposed regulations in this notice of proposed rulemaking would affect corporations that experience an ownership change for purposes of section 382.

DATES: Written or electronic comments must be received by March 16, 2020. Written or electronic requests for a public hearing and outlines of topics to be discussed at the public hearing must be received by March 16, 2020.

ADDRESSES: Submit electronic submissions via the Federal eRulemaking Portal at [www.regulations.gov](http://www.regulations.gov) (indicate IRS and REG-125710-18) by following the online instructions for submitting comments. Once submitted to the Federal eRulemak-

ing Portal, comments cannot be edited or withdrawn. The Department of the Treasury (Treasury Department) and the IRS will publish for public availability any comment received to its public docket, whether submitted electronically or in hard copy. Send hard copy submissions to: Internal Revenue Service, CC:PA:LPD:PR (REG-125710-18), Room 5203, Post Office Box 7604, Ben Franklin Station, Washington, DC 20044.

FOR FURTHER INFORMATION CONTACT: Concerning the proposed regulations, Jonathan R. Neuville at (202) 317-5363; concerning submissions of comments or requests for a public hearing, Regina L. Johnson at (202) 317-6901 (not toll-free numbers).

#### SUPPLEMENTARY INFORMATION:

##### Background

On September 10, 2019, the Treasury Department and the IRS published in the **Federal Register** (84 FR 47455) a notice of proposed rulemaking (REG-125710-18) proposing revisions to the rules in §§1.382-2 and 1.382-7 (September 2019 proposed regulations). These rules would affect the determination of net built-in gains and losses and recognized built-in gains and losses under section 382(h) that, in turn, affect the limitation under section 382 on net operating losses and disallowed business interest expense under section 163(j).

Proposed §§1.382-2(b)(4) and 1.382-7(g)(1), as set forth in the September 2019 proposed regulations, provided that the September 2019 proposed regulations would apply to ownership changes that occur after the date the Treasury decision adopting the September 2019 proposed regulations as final regulations is published in the **Federal Register**. As noted in part II of the Background in the September 2019 proposed regulations, section V of Notice 2003-65 (2003-2 C.B. 747) provides that taxpayers may rely on either of two safe harbor approaches for applying section 382(h) to an ownership change “prior to the effective date of temporary or final regulations under section 382(h).”

Taxpayers and practitioners have expressed concern that the applicability date

set forth in the September 2019 proposed regulations would impose a significant burden on taxpayers evaluating and negotiating business transactions, due to their uncertainty regarding when those transactions will close and when the September 2019 proposed regulations will be finalized. As a result, taxpayers and practitioners have requested transition relief with regard to ownership changes caused by pending transactions. In connection with this request, taxpayers and practitioners also have expressed concern that transition relief limited to transactions for which a binding agreement is in effect on or before the applicability date of final regulations would be inadequate, because pending transactions regularly are modified or delayed prior to closing.

As explained more fully in the Explanation of Provisions, this notice of proposed rulemaking modifies the applicability dates for the September 2019 proposed regulations by withdrawing the text of proposed §§1.382-2(b)(4) and 1.382-7(g), as set forth in the September 2019 proposed regulations, and proposing revised applicability dates.

#### Explanation of Provisions

##### I. Delay of Applicability Date and Applicability of Pre-existing Guidance

To address the concerns raised by taxpayers and practitioners, the Treasury Department and the IRS are withdrawing the text of proposed §§1.382-2(b)(4) and 1.382-7(g) contained in the September 2019 proposed regulations. In its place, the Treasury Department and the IRS are proposing the revised applicability date text set forth in proposed §§1.382-2(b)(4) and 1.382-7(g) as contained in this notice of proposed rulemaking.

The Treasury Department and the IRS do not intend there to be any gap between the date on which taxpayers can no longer rely on Notice 2003-65 and the date on which the final regulations are applicable. Other than in the case of the two exceptions described in parts II and III of this Explanation of Provisions, the applicability date of the final regulations will be 30 days after the date the Treasury decision containing such regulations is published in the **Federal Register** (delayed applica-

bility date). As provided in this proposed regulation, Notice 2003-65 will remain applicable to ownership changes to which the final regulations do not apply.

## II. Limiting Duplicative Application of Section 382

The first exception to the delayed applicability date relates to the rule in proposed §1.382-7(d)(5), which provides that certain carryforwards of business interest expense disallowed under section 163(j) would not be treated as recognized built-in losses under section 382(h)(6)(B) if such amounts were allowable as deductions during the five-year recognition period set forth in section 382(h)(7)(A). This rule eliminates the possible duplicative application of section 382 to certain disallowed business interest expense carryforwards. Due to the noncontroversial nature of this rule, the Treasury Department and the IRS have determined that proposed §1.382-7(d)(5) should be finalized before the remainder of the rules in the September 2019 proposed regulations, and that taxpayers should be allowed to retroactively apply this rule. To that end, the Treasury Department and IRS expect that proposed §1.382-7(d)(5) will be finalized as part of the Treasury decision that finalizes the proposed section 163(j) regulations (see 83 FR 67490) and taxpayers will be permitted to apply the rule to prior periods. The Treasury Department and the IRS continue to actively study the remainder of the rules in the September 2019 proposed regulations.

## III. Transition Relief Provisions

Under the transition relief provisions proposed in this notice of proposed rulemaking, the final regulations would not apply to certain ownership changes that occur after the delayed applicability date. As discussed in part I of this Explanation of Provisions, the delayed applicability date will be 30 days after the date these regulations are published in the **Federal Register**. In order for an ownership change after the delayed applicability date to qualify for transition relief, the ownership change must occur immediately after an owner shift or equity structure shift that occurs:

(1) Pursuant to a binding agreement in effect on or before the delayed applicability date and at all times thereafter;

(2) Pursuant to a specific transaction described in a public announcement made on or before the delayed applicability date;

(3) Pursuant to a specific transaction described in a filing with the Securities and Exchange Commission submitted on or before the delayed applicability date;

(4) By order of a court (or pursuant to a plan confirmed, or a sale approved, by order of a court) in a title 11 or similar case (as defined in section 382(l)(5)(F)), provided that the taxpayer was a debtor in a case before such court on or before the delayed applicability date; or

(5) Pursuant to a transaction described in a private letter ruling request submitted to the IRS on or before the delayed applicability date.

The relevant owner shift or equity structure shift must be a specific, identifiable transaction. For example, a stock buyback pursuant to an announced, on-going program would not qualify.

Taxpayers may continue to rely on Notice 2003-65 with respect to any ownership change qualifying for transition relief, even though the Notice will be obsoleted on the delayed applicability date. However, a taxpayer may choose to apply the final regulations to such an ownership change.

### Special Analyses

These proposed regulations are not subject to review under section 6(b) of Executive Order 12866 pursuant to the Memorandum of Agreement (April 11, 2018) between the Treasury Department and the Office of Management and Budget regarding review of tax regulations.

Pursuant to the Regulatory Flexibility Act (RFA), 5 U.S.C. chapter 6, the Treasury Department and the IRS hereby certify that these proposed regulations will not have a significant economic impact on a substantial number of small entities. This proposed rule is limited to revising the proposed applicability date of proposed regulations under section 382(h) of the Internal Revenue Code that were published in the **Federal Register** (84 FR 47455) on September 10, 2019. Based on the narrow scope of corporate trans-

actions covered by the proposed regulations' delayed applicability rules, the Treasury Department and the IRS have determined that these proposed regulations are unlikely to affect a substantial number of small entities and are unlikely to have a significant economic impact on any small entities affected.

The Treasury Department and the IRS invite comments on any impact that these regulations would have on small entities.

Pursuant to section 7805(f), this notice of proposed rulemaking has been submitted to the Chief Counsel for Advocacy of the Small Business Administration for comment on its impact on small business.

### Comments and Requests for Public Hearing

The Treasury Department and the IRS appreciate the comments that taxpayers and practitioners already have provided regarding the September 2019 proposed regulations and encourage taxpayers and practitioners to provide comments on the proposed regulations contained in this notice of proposed rulemaking. In particular, the Treasury Department and the IRS request comments on whether taxpayers should be permitted to apply the final regulations to ownership changes occurring before the applicability date and what restrictions, if any, should be placed on such retroactive application.

Before these proposed regulations are adopted as final regulations, consideration will be given to any comments that are submitted timely to the Treasury Department and the IRS as prescribed in this preamble under the "**ADDRESSES**" heading. All comments will be available at <http://www.regulations.gov> or upon request. A public hearing will be scheduled if requested in writing by any person that timely submits written comments. If a public hearing is scheduled, notice of the date, time, and place of the public hearing will be published in the **Federal Register**.

### Statement of Availability of IRS Documents

Notice 2003-65 is published in the Internal Revenue Bulletin (or Cumulative Bulletin) and is available from the Super-

intendent of Documents, U.S. Government Publishing Office, Washington, DC 20402, or by visiting the IRS website at <http://www.irs.gov>.

### Drafting Information

The principal authors of this notice of proposed rulemaking are Jonathan R. Neuville of the Office of Associate Chief Counsel (Corporate) and Kevin M. Jacobs, formerly of the Office of Associate Chief Counsel (Corporate). However, other personnel from the Treasury Department and the IRS participated in their development.

### List of Subjects in 26 CFR Part 1

Income taxes, Reporting and record-keeping requirements.

### Partial Withdrawal of Notice of Proposed Rulemaking

Accordingly, under the authority of 26 U.S.C. 382(h)(3)(B)(ii), 382(m), and 7805, §1.382-2(b)(4) and 1.382-7(g) of the notice of proposed rulemaking (REG-125710-18) published in the **Federal Register** on September 10, 2019 (84 FR 47455) are withdrawn.

### Proposed Amendments to the Regulations

Accordingly, 26 CFR part 1 is proposed to be amended as follows:

#### PART 1—INCOME TAXES

Paragraph 1. The authority citation for part 1 is amended by revising the entry for §1.382-7 to read as follows:

Authority: 26 U.S.C. 7805 \* \* \*

Section 1.382-7 also issued under 26 U.S.C. 382(h)(3)(B)(ii) and (m).

\* \* \* \* \*

Par. 2. Section 1.382-1, as proposed to be revised by 84 FR 47455, September 10, 2019, is further amended by revising the entry for §1.382-7(g) to read as follows:

#### §1.382-1 Table of Contents.

\* \* \* \* \*

#### §1.382-7 Built-in gains and losses.

\* \* \* \* \*

(g) Applicability dates.

(1) In general.

(2) Transition relief.

(3) Paragraph (d)(2)(vi) of this section.

\* \* \* \* \*

Par. 3. Section 1.382-2, as proposed to be amended by 84 FR 47455, September 10, 2019, is further amended by revising paragraph (b)(4) to read as follows:

#### §1.382-2 General rules for ownership change.

\* \* \* \* \*

(b) \* \* \*

(4) *Rules provided in paragraphs (a) (9) through (13) of this section.* The rules of paragraphs (a)(9) through (13) of this section apply to any ownership change that occurs after the date that is 30 days after the date of publication in the **Federal Register** of a Treasury decision adopting these proposed regulations as final regulations, if §1.382-7(g)(2) does not apply to that ownership change. Notwithstanding the preceding sentence, a taxpayer may apply the rules of paragraphs (a)(9) through (13) of this section to an ownership change to which §1.382-7(g)(2) applies if the taxpayer applies the rules of §1.382-7 to such ownership change.

Par. 4. Section 1.382-7, as proposed to be revised by 84 FR 47455, September 10, 2019, is amended by revising paragraph (g) to read as follows:

#### §1.382-7 Built-in gains and losses.

\* \* \* \* \*

(g) *Applicability dates—(1) In general.* Except as otherwise provided in this paragraph (g), this section applies to any ownership change that occurs after the date that is 30 days after the date of publication in the **Federal Register** of a Treasury decision adopting the rules of this section as final regulations (applicability date), if paragraph (g)(2) of this section does not apply to that ownership change. For ownership changes occurring on or before the applicability date and ownership changes to which paragraph (g)(2) of

this section applies, see §1.382-7 as contained in 26 CFR part 1, revised April 1, 2019, and other applicable guidance, including Notice 2003-65 (2003-2 CB 747) (see §601.601(d)(2)(ii)(b) of this chapter). Notwithstanding the preceding sentences of this paragraph (g)(1), a taxpayer may apply this section to an ownership change to which paragraph (g)(2) of this section applies.

(2) *Certain ownership changes eligible for transition relief.* This paragraph (g)(2) applies to an ownership change after the applicability date that occurs immediately after an owner shift or equity structure shift, if the owner shift or equity structure shift occurs—

(i) Pursuant to a binding agreement in effect on or before the applicability date and at all times thereafter;

(ii) Pursuant to a specific transaction described in a public announcement made on or before the applicability date;

(iii) Pursuant to a specific transaction described in a filing with the Securities and Exchange Commission submitted on or before the applicability date;

(iv) By order of a court (or pursuant to a plan confirmed, or a sale approved, by order of a court) in a title 11 or similar case (as defined in section 382(l)(5)(F)), provided that the taxpayer was a debtor in a case before such court on or before the applicability date; or

(v) Pursuant to a transaction described in a ruling request submitted to the IRS on or before the applicability date.

(3) *Paragraph (d)(2)(vi) of this section.* Paragraph (d)(2)(vi) of this section applies to loss corporations that have undergone an ownership change on or after June 11, 2010. For loss corporations that have undergone an ownership change before June 11, 2010, see §1.382-7T as contained in 26 CFR part 1, revised April 1, 2009.

Sunita Lough  
*Deputy Commissioner for Services  
and Enforcement.*

(Filed by the Office of the Federal Register on September 9, 2019, 8:45 a.m., and published in the issue of the Federal Register for September 10, 2019, 84 F.R. 47455)

# 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 situations, 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.  
C.B.—Cumulative Bulletin.  
CFR—Code of Federal Regulations.  
CI—City.  
COOP—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.  
E.O.—Executive Order.  
ER—Employer.

ERISA—Employee Retirement Income Security Act.  
EX—Executor.  
F—Fiduciary.  
FC—Foreign Country.  
FICA—Federal Insurance Contributions Act.  
FISC—Foreign International Sales Company.  
FPH—Foreign Personal Holding Company.  
FR.—Federal Register.  
FUTA—Federal Unemployment Tax Act.  
FX—Foreign corporation.  
G.C.M.—Chief Counsel’s Memorandum.  
GE—Grantee.  
GP—General Partner.  
GR—Grantor.  
IC—Insurance Company.  
I.R.B.—Internal Revenue Bulletin.  
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.  
S.P.R.—Statement of Procedural Rules.  
Stat.—Statutes at Large.  
T—Target Corporation.  
T.C.—Tax Court.  
T.D.—Treasury Decision.  
TFE—Transferee.  
TFR—Transferor.  
T.I.R.—Technical Information Release.  
TP—Taxpayer.  
TR—Trust.  
TT—Trustee.  
U.S.C.—United States Code.  
X—Corporation.  
Y—Corporation.  
Z—Corporation.

## **Numerical Finding List<sup>1</sup>**

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### **Revenue Rulings:**

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<sup>1</sup> A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2018–27 through 2018–52 is in Internal Revenue Bulletin 2018–52, dated December 27, 2018.

## **Finding List of Current Actions on Previously Published Items<sup>1</sup>**

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<sup>1</sup> A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2018–27 through 2018–52 is in Internal Revenue Bulletin 2018–52, dated December 27, 2018.

# **Internal Revenue Service**

## **Washington, DC 20224**

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Official Business  
Penalty for Private Use, \$300

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## **INTERNAL REVENUE BULLETIN**

The Introduction at the beginning of this issue describes the purpose and content of this publication. The weekly Internal Revenue Bulletins are available at [www.irs.gov/irb/](http://www.irs.gov/irb/).

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## **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](http://www.irs.gov)) or write to the Internal Revenue Service, Publishing Division, IRB Publishing Program Desk, 1111 Constitution Ave. NW, IR-6230 Washington, DC 20224.