

IRS News Release

Media Relations Office

Washington, D.C.

Media Contact: 202.622.4000

www.irs.gov/newsroom

Public Contact: 800.829.1040

IRS Seeks New Issues for the Industry Issue Resolution Program

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WASHINGTON — The Internal Revenue Service is encouraging business taxpayers, associations and other interested parties to submit to the Industry Issue Resolution (IIR) Program tax issues for resolution involving a controversy, a dispute or an unnecessary burden on business taxpayers.

Though submissions can be made at anytime for consideration in the IIR program, submitted issues received by March 31, 2009, will be considered for acceptance in April and, if accepted, included on the Treasury/IRS Priority Guidance List.

The objective of the IIR program is to resolve business tax issues common to significant numbers of taxpayers through new and improved guidance. In past years, issues have been submitted by associations and others representing both small and large business taxpayers, resulting in tax guidance that has affected thousands of taxpayers.

Recent submissions accepted into the IIR program include:

- Technical Terminations of publicly traded partnerships.

Guidance issued as a result of the IIR program includes:

- Auto Last In First Out - for automobile wholesalers, manufacturers and dealers regarding the proper treatment of the dollar-value, LIFO inventory method for pooling purposes of crossover vehicles, which have characteristics of trucks and cars. (Revenue Procedure 2008-33)
- Valuation of Parts Inventory by Heavy Equipment Distributors (Revenue Procedure 2006-14)
- Clarification regarding circumstances when facsimile signatures may be used to sign employment tax forms. (Revenue Procedure 2005-39)
- Explanation of the circumstances under which insurance companies that make incentive payments to health care providers will be permitted to include those payments in unpaid losses. The revenue procedure also provides procedures under which a taxpayer may obtain automatic consent of the Commissioner to change their accounting method for such payments. (Revenue Procedure 2004-41)

IIR project selections are based on the criteria set forth in [Revenue Procedure 2003-36](#). For each issue selected, a multi-functional team consisting of IRS, Chief Counsel, and Treasury personnel will be assembled. The team will gather and analyze the relevant facts

from industry groups and taxpayers and, wherever possible, recommend guidance. This benefits both taxpayers and the IRS by saving time and expense that would otherwise be expended on resolving the issue through examinations.

Requests for guidance on tax issues under the IIR program can be submitted at any time to IIR@irs.gov. Submissions received are reviewed semi-annually with selections next being made from issues submitted by March 31, 2009.