Information About Your Notice, Penalty and Interest

The interest rates on underpayment and overpayment of taxes are as follows:

<table>
<thead>
<tr>
<th>Periods</th>
<th>Underpayment</th>
<th>Overpayment</th>
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<tbody>
<tr>
<td>April 1, 2009 through December 31, 2010</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>January 1, 2011 through March 31, 2011</td>
<td>3</td>
<td>3</td>
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<tr>
<td>April 1, 2011 through September 30, 2011</td>
<td>4</td>
<td>4</td>
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<tr>
<td>October 1, 2011 through March 31, 2016</td>
<td>3</td>
<td>3</td>
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<tr>
<td>April 1, 2016 through March 31, 2016</td>
<td>4</td>
<td>4</td>
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<tr>
<td>April 1, 2018 through December 31, 2018</td>
<td>5</td>
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<tr>
<td>January 1, 2019 through June 30, 2019</td>
<td>6</td>
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<tr>
<td>July 1, 2019 through June 30, 2020</td>
<td>5</td>
<td>5</td>
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<tr>
<td>July 1, 2020 through March 31, 2022</td>
<td>3</td>
<td>3</td>
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<tr>
<td>April 1, 2022 through June 30, 2022</td>
<td>4</td>
<td>4</td>
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<tr>
<td>Beginning July 1, 2022</td>
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Beginning January 1, 1999, the interest rate we pay on any overpayment of taxes, except for corporate taxes, is the same as the rate of interest we charge on the underpayment of taxes. The law requires us to determine these interest rates quarterly. From January 1, 1987 through December 31, 1998, the interest rate we paid on an overpayment of taxes was one percent less than the rate of interest we charged on your underpayment of taxes. Effective January 1, 1995, we pay a reduced rate of interest on corporate overpayments that exceed $10,000. This reduced rate is the short-term federal interest rate, plus %/2%. We compound interest daily, except on late or underpaid estimated taxes for individuals or corporations.

If you have an underpayment resulting from a tax motivated transaction (for returns due before January 1, 1990), we charge a special interest rate of 120 percent of the underpayment rate.

We charge interest on penalties for filing late, paying late, over or understating valuations, and substantially understating the tax you owe.

Also, we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988. For returns due after December 31, 1989, the Accuracy-Related Penalty is charged interest from the later of the return due date or extended due date.

We continue to charge interest until you pay the amount you owe in full. After December 31, 1990, the law allows us to charge interest at the underpayment rate plus two percent on large corporate underpayments of more than $100,000.

About Your Notice

You may call your local IRS telephone number if the number shown on your notice is a long-distance call for you. All days mentioned in the paragraphs below are calendar days, unless specifically stated otherwise.

Removal of Penalties

Reasonable Cause. The law lets us reduce or remove the penalties we explain in this notice if you have an acceptable reason. If you believe you have a reasonable cause you may contact us to explain the reason(s), establishing you used ordinary business care and prudence to comply with your Federal tax obligations but were nonetheless unable to do so. We will consider the facts and circumstances presented and will let you know if we accept or reject your reasonable cause. This procedure does not apply to interest. See Penalty Relief, www.irs.gov.

Erroneous Written Advice from IRS

We will also remove your penalty if:

- you wrote to IRS and asked for advice on a specific issue,
- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,
- request that IRS remove the penalty, and
- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and
- a notice (if any) showing the penalty we charged that you now wish to remove.

Deposit Penalties - IRC 6656

We may charge penalties if you do not make required deposits on time, make deposits for less than the required amount or if you do not use EFTPS when required. We will not charge penalties if you did not willfully neglect to make a proper and timely deposit and you have a reasonable cause. For amounts not properly or timely deposited, the penalty rates are:

- 2% — deposits made 1 to 5 days late,
- 5% — deposits made 6 to 15 days late,
- 10% — deposits made 16 days or more late, but on or before the 10th day after the date of the first notice we sent you asking for the tax you owe.
- 10% — deposits made to an unauthorized financial institution, or payments made directly to the IRS, or paid with your tax return.
- 10% — Amounts subject to electronic deposit requirements but not deposited using EFTPS.
- 15% — Amounts still unpaid more than 10 days after the date of the first notice the IRS sent asking for the tax due or the day on which you received notice and demand for immediate payment, whichever is earlier.

The law allows you to tell the IRS where to apply your deposits within the tax return period with a deposit penalty. You have 90 days from the date of the correspondence you received showing the deposit penalty to contact the IRS if you want to specify where to apply your deposits.

Also, the law allows the IRS to remove the deposit penalty if: (1) the penalty applies to the first required deposit after a required change to your frequency of deposits, and (2) you file your employment tax returns by the due date.

Filing and Paying Late - IRC 6651 — We charged penalties for filing and paying late because, according to our records, you filed your return late and didn’t pay your tax when it was due.

The penalty for filing late is 1% of the unpaid tax assessed that was not paid when due. It is charged each month or part of a month the return is late, for up to 5 months.

The penalty for paying late is 5% of the total tax due.

When both penalties are charged for the same month, we reduce the penalty for filing late by the penalty for paying late for that month.

For returns due before 12/31/2008, if you didn’t file your return within 60 days of the due date, the minimum penalty is $100 or 100% of the tax due on your return, whichever is smaller. For returns due after 12/31/2008, the minimum penalty is the lesser of $153 or 100% of the tax due. For returns due after 12/31/2015, the minimum penalty is the lesser of $205 or 100% of the tax due. For returns due after 12/31/2017, the minimum penalty is the lesser of $210 or 100% of the tax due. For returns due after 12/31/2019, the minimum penalty is the lesser of $435 or 100% of the tax due (the $435 penalty amount is subject to annual inflation adjustments). If you think we should remove or reduce either of these penalties, see “Removal of Penalties - Reasonable Cause.”

Underpayment or Late Payment of Estimated Tax - IRC 6654 — We charged you a penalty because, according to our records, you didn’t estimate your tax and pay the correct amount of tax due.

Individuals, Estates, and Certain Trusts — If you expect to owe tax of $1,000 or more for the tax year, you must prepay the tax by having tax withheld or by making estimated tax payments. We charge a penalty when the total tax you pay during the year doesn’t meet the requirements of the law.

The law requires you to pay at least 90% of the tax shown on your return for the current year or 100% of the tax shown on your return for the prior year, whichever is less. Otherwise, you must make estimated tax payments equal to the lesser of 25% of the total amount you expect to owe for the year.

Estimated Tax Safe Harbor for Higher Income Individuals - IRC 6654(d) — For more information on when the estimated tax penalty may be reduced or removed, see the instructions for Form 2210 for your tax year or Publication 505, Tax Withholding and Estimated Tax.

Corporations — We charge a penalty for not estimating your tax correctly when the corporation owes $500 or more in tax, and the total payments made on time are less than the required amount.

Notice 746 (Rev. 7-2022) Catalog Number 63146F Department of the Treasury Internal Revenue Service www.irs.gov
For tax years beginning after December 31, 1993, the law requires corporations to pay their estimated tax in 4 quarterly payments (unless income is seasonal or the corporation used an annualized income method to estimate its tax) to avoid penalties. A penalty is charged because it appears that you didn’t pay the correct amounts of tax on time.

Penalty Amounts

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Failure to Deposit - IRC 6656(b) — Federal Tax Deposits Insufficient/Late - We charged a penalty because it appears that you didn’t deposit the correct amounts of tax on time. If the penalty is $2,500 or more, the penalty rate is 1% a month. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.” Also see Publication 15, Circular E — Employer’s Tax Guide or Publication 51, Circular A — Agricultural Employer's Tax Guide for deposit requirements.

Failure to Deposit - IRC 6656(c) — Exempt Organizations and Certain Trusts. We charged a penalty because, according to our records, you didn’t pay the tax on time. Initially, the penalty is 1/2% of the unpaid tax for each month or part of a month you didn’t pay your tax. The penalty can’t be more than 25% of the tax liability.

Penalty Rate

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Failure to Deposit - IRC 6656 — Charged a penalty because it appears that you didn’t deposit the correct amounts of tax on time. A penalty rate is $210 for each month or part of a month that the tax is not deposited, deposited late, or not deposited in the correct amounts.

Incomplete Return - IRC 6652 — Charged a penalty because, according to our records, you didn’t file a complete return. For Forms 990, 990EZ, and 990PF, the penalty is: (1) $20 a day for each day your return is incomplete, if your gross annual receipts are equal to or less than $1,094,500. The penalty may not be more than $10,500. (2) $105 a day for each day your return is incomplete, if your gross annual receipts exceed $1,094,500, but the penalty may not be more than $54,500. For all other forms, the penalty is $10 a day for each day your return is incomplete. The penalty may not be more than $5,000. These penalty amounts are subject to annual inflation adjustments.

Penalty Removed — We removed the penalty we charged you and we are reviewing your account. We will let you know the results.

Penalty on Tips - IRC 6652(b) — We charged a penalty because, according to our records, you didn’t report your tips to your employer. The penalty is 50% of the social security tax or the Medicare part of the unemployment tax on the tips you didn’t report. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.”

Partnership Late Filing - IRC 6656 — We charged a penalty because, according to our records, you filed your partnership return late. The penalty is $210 for each month or part of a month that the return is not filed, deposited late, or not deposited in the correct amounts. These penalty amounts are subject to annual inflation adjustments for returns due after 2014. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

S Corporation Late Filing - IRC 6699 — We charged a penalty because, according to our records, you filed your S Corporation return late. The penalty is $210 for each person who was a shareholder at any time during the tax year, for each month or part of a month that the return was filed late, for up to 12 months. If you think we should remove or reduce this penalty, see “Removal of Penalties - Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

Filing Late Return - IRC 6658(a) — We charged a penalty because, according to our records, your S corporation return was incomplete and you didn’t give us the information we requested. The penalty is $210 for each person who was a shareholder at any time during the tax year, for each month or part of a month that the return was filed late, for up to 12 months. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

Failure to Deposit - IRC 6656(c) — Exempt Organizations and Certain Trusts. We charged a penalty because, according to our records, you filed your return late. For Forms 990, 990EZ, and 990PF, the penalty is: (1) $20 a day for each day your return is late, if your gross annual receipts are equal to or less than $1,094,500. If the penalty is $2,500 or more, the penalty rate is 1% a month. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.”

Penalty Rate

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Failure to Deposit - IRC 6656 — Charged a penalty because it appears that you didn’t deposit the correct amounts of tax on time. A penalty rate is $210 for each month or part of a month that the tax is not deposited, deposited late, or not deposited in the correct amounts. These penalty amounts are subject to annual inflation adjustments for returns due after 2014. If you think we should remove or reduce this penalty, see “Removal of Penalties — Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

Filing Late Return - IRC 6658(a) — We charged a penalty because, according to our records, your S corporation return was incomplete and you didn’t give us the information we requested. The penalty is $210 for each person who was a shareholder at any time during the tax year, for each month or part of a month that the return was filed late, for up to 12 months. If you think we should remove or reduce this penalty, see “Removal of Penalties - Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

Filing Late Return - IRC 6658(a) — We charged a penalty because, according to our records, your S corporation return was incomplete and you didn’t give us the information we requested. The penalty is $210 for each person who was a shareholder at any time during the tax year, for each month or part of a month that the return was filed late, for up to 12 months. If you think we should remove or reduce this penalty, see “Removal of Penalties - Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.

Filing Late Return - IRC 6658(a) — We charged a penalty because, according to our records, your S corporation return was incomplete and you didn’t give us the information we requested. The penalty is $210 for each person who was a shareholder at any time during the tax year, for each month or part of a month that the return was filed late, for up to 12 months. If you think we should remove or reduce this penalty, see “Removal of Penalties - Reasonable Cause.”

For returns due after January 1, 2021, the penalty rate is $210.

For returns due in 2020, the penalty rate is $205.

For returns due between January 1, 2018 and December 31, 2019, the base penalty rate is $205.

For returns due on or before December 31, 2017, the base penalty rate is $195.

These penalty amounts are subject to annual inflation adjustments.
We charged you a penalty because, according to our records:

- You didn't make your tax deposit on time or in the correct amounts, you didn't deposit the correct amounts of tax on time, or you didn't make an IRC section 444 election, and we couldn't determine if you made your deposits on time or in the correct amounts.

Therefore, we averaged the liability you reported and we applied the percentage rate, as shown below:

1. For returns with dates of March 31, 2009:
   - For returns with dates of March 31, 2009:
     - The penalty is 40 percent of the portion of the underpayment attributable to one or more non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to one or more non-economic substance transactions.

2. For returns with dates of March 31, 2010:
   - For returns with dates of March 31, 2010:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

3. For returns with dates of April 15, 2011:
   - For returns with dates of April 15, 2011:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

4. For returns with dates of April 15, 2012:
   - For returns with dates of April 15, 2012:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

5. For returns with dates of April 15, 2013:
   - For returns with dates of April 15, 2013:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

6. For returns with dates of April 15, 2014:
   - For returns with dates of April 15, 2014:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

7. For returns with dates of April 15, 2015:
   - For returns with dates of April 15, 2015:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

8. For returns with dates of April 15, 2016:
   - For returns with dates of April 15, 2016:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

9. For returns with dates of April 15, 2017:
   - For returns with dates of April 15, 2017:
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
     - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

10. For returns with dates of April 15, 2018:
    - For returns with dates of April 15, 2018:
      - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.
      - The penalty is 40 percent of the portion of the underpayment attributable to non-disclosed non-economic substance transactions.

We averaged your total tax deposits and payments to the IRS, the amounts you reported in your tax return, and the amounts we determined based on our records. We averaged these amounts equally throughout the tax period. Then we applied your deposits and payments to the liabilities in the order we received them, or the order we determined in our records. The penalty is the product of the percentage rate and the portion of the underpayment attributable to one or more non-economic substance transactions.

For tax years ending after October 22, 2004, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2009, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2010, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2011, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

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For tax years ending after March 31, 2013, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2014, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2015, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2016, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2017, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.

For tax years ending after March 31, 2018, we charged a penalty of 40% of the portion of the underpayment attributable to one or more non-economic substance transactions. The penalty is increased to 40% for a substantial underpayment, as determined by the law. The penalty is increased to 40% for a substantial underpayment, as determined by the law.
If you are a C corporation, and for tax years ending on or before December 31, 1992. We applied your deposits in the deposit period. We figured the penalty on any tax not deposited, deposited late, or not deposited in the correct amounts.

For deposits due after December 31, 1989, see Failure to Deposit - IRC 6656. Since your average amount of liability was $100,000 or more, we placed the liability on the first day of the applicable semi-weekly period (eighth-monthly period for tax years ending on or before December 31, 1992). We applied your deposits in the deposit period. We figured the penalty on any tax not deposited, deposited late, or not deposited in the correct amounts.

Interest - IRC 6601

Interest — We are required by law to charge interest when you do not pay the amount you owe on time. Generally, we charge interest from the due date of your return (regardless of extensions) until you pay the amount you owe in full, including all interest and any penalty charges. Interest rates are variable and may change quarterly.

Corporate interest — If you are a C corporation, and you underpaid your tax by more than $100,000 for any taxable period, we charge additional interest of 2% if the full amount shown as due on a notice isn’t paid within 30 days of the notice date. If you don’t pay within 30 days, interest at the higher rate begins on the 31st day after the notice date. Once the additional 2% rate begins to apply, we charge the additional interest on all underpayments for that type of tax and that tax period until you pay your balance in full.

Additional Interest Charges — If the amount you owe is $100,000 or more, please make sure that you receive your payment within 10 business days from the date of your notice. If the amount you owe is less than $100,000, please make sure that you receive your payment within 21 calendar days from the date of your notice. If we don’t receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Partnership Interest — If the partnership fails to pay within the applicable grace period after the first notice, interest on the balance due will continue to run at the standard underpayment rate under IRC 6621(a)(2) (B) for the first 10 calendar days after the notice and demand date. After that if it is still not paid, interest on the balance due will be calculated with an extra 2% rate until it is paid in full.

Section 6621(a)(2)(B) adds 3 percentage points to the Federal short-term rate determined under section 6621(b) for purposes of establishing the interest rate on underpayments of tax.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the United States Treasury as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed-Erroine Refund

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:
- you didn’t cause the erroneous refund in any way,
- and
- the refund does not exceed $50,000.
- The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting — Effective January 1, 1987 through December 31, 1996, the interest rate we paid on any overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest for claiming a refund and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero - IRC 6621(d)

General Rule — If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 94-43, 1994-47 I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available at www.irs.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you paid the tax, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund. You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. Mail: Internal Revenue Service Net Rate Interest Netting Claim P.O. Box 9987 Mail Stop 6800 Ogden, UT 84409

Other than U.S. mail: Internal Revenue Service Net Rate Interest Netting Claim 1150 West 1200 South Mail Stop 6800 Ogden, UT 84201

If your request for interest netting involves solely interest that you owed the IRS or that the IRS owed you on or after October 1, 1998, send Form 843 to the Internal Revenue Service Center where you filed your most recent federal income tax return. For more information on these Form 843 filing requirements, see Revenue Procedure 2000-26, 2000-24 I.R.B. 1. Revenue Procedure 2000-26 is available at www.irs.gov.