

INTERNAL REVENUE SERVICE

CC:DOM:P&SI:1-COR-104682-00
May 10, 2000

Number: **INFO 2000-0061**
Release Date: 6/30/2000

UILC 1362.00-00

This responds to correspondence, submitted on your behalf by [REDACTED], requesting late S corporation relief for an effective date of January 1, 1997.

In Rev. Proc. 97-48 (copy attached) the Internal Revenue Service provides special procedures that permit taxpayers in certain situations to obtain automatic late S corporation relief instead of applying for a private letter ruling. The facts presented in your situation appear to be covered by section 4.01 of Rev. Proc. 97-48. To receive relief under provisions of this revenue procedure, please complete the enclosed Form 2553 and submit it to the Fresno Service Center pursuant to this revenue procedure.

Please keep this letter with your tax records and feel free to provide a copy of it to your authorized representative. We hope that the above information proves helpful.

Sincerely yours,

Signed/Dianna K. Miosi

DIANNA K. MIOSI
Chief, Branch 1
Office of the Assistant Chief Counsel
(Passthroughs and Special Industries)

Attachment:
Rev. Proc. 97-48
Form 2553