

INTERNAL REVENUE SERVICE

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June 9, 2000

UILC 1362.00-00

[REDACTED]

We are responding to your correspondence requesting relief in order to establish January 27, 1998, as the effective date for your S corporation election. This letter confirms that Internal Revenue Service representatives have completed their research and updated your account to reflect S corporation status for the effective date requested.

You should have received a letter from Memphis Service Center staff confirming acceptance. If not, please contact our office and we will ask them to forward a copy of the letter to you.

Once an S corporation election is made, it remains in effect until it is terminated. If the election is terminated in a post-1996 tax year, then the corporation (or successor corporation) can make another election on Form 2553 only with IRS consent for any tax year before the 5th tax year after the first tax year in which the termination took effect.

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)