

INTERNAL REVENUE SERVICE

Number: **INFO 2000-0241**

Release Date: 9/30/2000

[REDACTED]

[REDACTED]

(202) 622-3050

CC:PSI:B01 COR-115122-00-00  
August 31, 2000

[REDACTED]:

UILC 1362.00-00

This letter responds to your correspondence requesting Subchapter S corporation status effective for May 16, 1998, under the relief provisions provided by § 1362(b)(5) of the Internal Revenue Code.

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 the provisions of this revenue procedure, normally one must follow the procedural requirements described in section 4.01(2). However, we have intervened on your behalf and asked the Service Center staff to update your records to reflect an effective date as you requested. If you fail to receive a letter confirming the account update within 60 days from the date of this letter, you may contact the Ogden Taxpayer Advocate.

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,

**/s/ Dianna K. Miosi**  
DIANNA K. MIOSI  
Chief, Branch 1  
Associate Chief Counsel  
(Passthroughs and Special Industries)