



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

OFFICE OF
CHIEF COUNSEL

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January 15, 2002



Dear [REDACTED]:

This letter is in response to your correspondence of [REDACTED], regarding your request that an exception to the 60-day rollover period be extended with respect required minimum distributions that were taken in 2001 prior to the publication of new required minimum distribution regulations in the Federal Register on January 17, 2001.

Section 408(d)(3) of the Internal Revenue Code governs rollover contributions. In order to be a rollover contribution, one of requirements that must be met under section 408(d) is that an amount distributed from an individual's IRA must be paid into an IRA for the benefit of that individual not later than the 60th day after the day on which the distribution is received. Unfortunately, there is no statutory authority for providing an exception to the 60-day rollover period for distributions taken in 2001.

We hope the information included in this letter will be of assistance to you. However, this letter does not constitute a ruling on any of the matters discussed.

If you have additional questions or concerns, please contact [REDACTED] [REDACTED] of my staff at (202) 622-6090 (not a toll-free number).

Sincerely,

Michael J. Roach
Chief, Qualified Plans Branch 1
(Employee Benefits)
Office of the Division Counsel/Associate
Chief Counsel (Tax Exempt and
Government Entities)