

**Internal Revenue Service**

Number: **INFO 2003-0279**

Release Date: 12/31/2003

Index Number: 1362.01-03

Department of the Treasury  
Washington, DC 20224

Person To Contact:  
, ID No.

Telephone Number:

Refer Reply To:  
CC:PSI:B03 – GENIN-155792-03

Date: October 27, 2003

Dear [REDACTED]:

This is in response to your letter dated May 22, 2003, requesting late S corporation relief under section 1362(b)(5) of the Internal Revenue Code, seeking an effective date of October 1, 2001.

In Rev. Proc. 2003-43, 2003-23 I.R.B. 998, (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 4.02 of Rev. Proc. 2003-43. The Cincinnati Service Center has updated your records to reflect October 1, 2001, as your S corporation effective date. If you fail to receive a confirmation letter from the service center within the next 60 days, you may contact the person indicated above.

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,

James A. Quinn  
Senior Counsel, Branch 3  
Office of Associate Chief Counsel  
(Passthroughs & Special Industries)

Enclosure  
Rev. Proc. 2003-43