

Internal Revenue Service

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Department of the Treasury

Washington, DC 20224

Person To Contact:

, ID No.

Telephone Number:

Refer Reply To:

CC:PSIB03 – GENINF-155807-03

Date:

November 14, 2003

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This responds to your correspondence dated May 28, 2003, submitted on your behalf by Wood & Associates Accounting, requesting late S corporation relief under Rev. Proc. 97-48, seeking an effective date of January 1, 2000.

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. The Ogden Service Center has updated your records to reflect January 1, 2000, 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,

Jeanne M. Sullivan
Senior Technician Reviewer, Branch 3
Office of Associate Chief Counsel
(Passthroughs & Special Industries)

Enclosure (1)

Rev. Proc. 97-48