

Internal Revenue Service

Department of the Treasury
Washington, DC 20224

Number: **INFO 2004-0018**

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Person To Contact:

, ID No.

Telephone Number:

In Re:

Refer Reply To:

CC:PSI – GENIN-164252-03

Date:

January 07, 2004

Dear _____ :

This responds to your request for late S corporation election relief to be effective as of the 1999 taxable year (year of incorporation). In Revenue Procedure 97-48, the Internal Revenue Service permits 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. In order to receive relief, you must resend a *fully completed* Form 2553 (copy enclosed) *and* accompanying statement to the following facsimile number:

IRS Cincinnati Service Center
Attn: Entity Control – Team 302
(859) 669-5748

Please retain your facsimile transmission receipt. If you fail to receive an acceptance notice within 60 days after transmitting your Form 2553, call the contact person listed in this letter. Keep this letter with your tax records and feel free to provide a copy of it to your authorized representative. We hope this information proves helpful.

Sincerely,

Dianna K. Miosi
Branch Chief
Office of Associate Chief Counsel
(Passthroughs & Special Industries)