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**From:**

**Sent:** Friday, February 27, 2009 3:09:19 PM

**To:**

**Cc:**

**Subject:** RE: Protecting S Corp & Shareholder Statutes on TEFRA case

There is no further extension needed. There is no separate S corporation statute. [Bufferd v. Commissioner](#), 113 S.Ct. 927 (1993). The TEFRA proceeding controls the assessment of indirect partners that hold their partnership interest through an S corporation. See [Sente Investment Club v. Commissioner](#), 95 T.C. 243 (1990). Partner or indirect partner consents (Forms 872-i) are only necessary if there is doubt as to the validity of a Tax Matters Partner consent on Form 872-P. We don't get Forms 872-i from S corporation since they generally are not taxpayers and have no power to extend the statutes of their shareholders. We would get a Form 872-i only from the indirect partners if there was any doubt about the TMP extension.