



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

OFFICE OF THE CHIEF COUNSEL

January 5, 2010

Number: **INFO 2010-0048**
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PUBWE-152552-09
UIL: 3127.00-00

Re: TAP 509-5873 Form 4029 Exemption for Disregarded Entities

Dear _____ :

Thank you for your letter dated December 1, 2009 concerning the Taxpayer Advocacy Panel's recommendation to amend the Treasury Regulations to treat certain single-member entities as disregarded entities for purposes of eligibility for the exemption from Federal Insurance Contributions Act taxes under section 3127 of the Internal Revenue Code for members of religious faiths opposed to participation in Social Security Act programs.

Published guidance plays an important role in increasing voluntary compliance by helping to clarify or simplify various requirements of the tax law. We encourage members of the tax community to make requests for published guidance with respect to any areas of the tax law that can be clarified or simplified through the published guidance process. We appreciate the time and effort the Taxpayer Advocacy Panel expended in preparing a submission concerning this recommendation.

We are aware of the need for guidance on the issue you have raised. Accordingly, we are committed to publishing guidance on this issue in the coming year. This project has been included on the Office of Tax Policy and Internal Revenue Service 2009-2010 Priority Guidance Plan, which was released on November 24, 2009.

Thank you again for your recommendation. Please do not hesitate to contact
of my office at if we may be of further assistance in this matter.

Sincerely,

Lynne Camillo
Branch Chief, Employment Tax Branch 2
(Exempt Organizations/ Employment Tax/
Government Entities)
(Tax Exempt & Government Entities)