

ID: CCA_2011042715054937

Number: **201121018**

Office:

Release Date: 5/27/2011

UILC: 6231.07-00

From:

Sent: Wednesday, April 27, 2011 3:06:00 PM

To:

Cc:

Subject: RE: TEFRA - TMP Question

Partnership Y is the TMP because in the absence of a valid TMP designation, the general partner with the largest profits interest automatically becomes TMP by operation of law. I.R.C. 6231(a)(7)(B). The managing partner of Y cannot be the TMP of partnership X because he is not a general partner of X. But he can sign documents on behalf of Y, the actual TMP.