

Section 1362(g) of the Code provides that if an S corporation has terminated its S corporation election under § 1362(d)(1) of the Code, then the corporation (and any successor corporation) shall not be eligible to make an election to be treated as an S corporation under § 1362(a) of the Code before its 5th taxable year which begins after the 1st taxable year for which such termination is effective, unless the Secretary consents to such election. To request the consent of the Secretary under § 1362(g) of the Code, the corporation must file a request for a Private Letter Ruling in accordance with Rev. Proc. 2014-1, 2014-1 I.R.B. 1 (or current version), including the payment of the appropriate user fee.

We wanted to inform you that we forwarded your request to the appropriate service center on your behalf on June 24, 2014.

This letter does not opine on whether a valid S election was in place, or the status of your request for a rescission to revoke your S corporation election. Please keep a copy of this letter for your records. Should you have any additional questions, please contact our office at () (not a toll free number).

In accordance with the Power of Attorney on file with this office, a copy of this letter is being sent to your authorized representative.

Sincerely,

Laura C. Fields

Laura C. Fields
Senior Technician Reviewer, Branch 1
Office of the Chief Counsel
(Passthroughs & Special Industries)

Encl:
Copy of your letter
postmarked Jan 2, 2014

cc: