

INTERNAL REVENUE SERVICE

Number: **INFO 2000-0271**

Release Date: 12/29/2000

Index Number 1362.00-00

[REDACTED]

CC:DOM:P&SI:1 COR-116502-00

September 26, 2000

[REDACTED]:

This responds to correspondence, submitted on your behalf by [REDACTED], CPA, requesting late S corporation relief under Revenue Procedure 98-55, seeking an effective date of March 18, 1999.

In Revenue Procedure 98-55, the Internal Revenue Service provides taxpayers in a certain situation automatic relief instead of applying for a private letter ruling. The facts presented in your situation appear to be covered by this revenue procedure. We have asked the Memphis Service Center to update your records to reflect your date of incorporation as your S corporation effective date. If fail to receive a confirmation letter from the service center within the next 60 days, you may call the our office for assistance.

Please keep this letter with your tax records and provide a copy of it to your authorized representative named above. We hope that this information proves helpful.

Sincerely yours,

**/s/Dianna K. Miosi**  
DIANNA K. MIOSI  
Chief, Branch 1  
Office of the Assistant Chief Counsel  
(Passthroughs and Special Industries)