



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

OFFICE OF
CHIEF COUNSEL

APR 17 2001

Number: **200141008**
Release Date: 10/12/2001
CC:TEGE:EOEG:ET1 - COR-103634-01
UILC: 3231.01-00

MEMORANDUM FOR

FROM: Office of Division Counsel/Associate Chief Counsel
(Tax Exempt and Government Entities)

SUBJECT: CC:TEGE:EOEG:ET1 - COR-103634-01
Railroad Retirement Act Tax Status

In accordance with the coordination procedure established between the Service and the Railroad Retirement Board (RRB), the RRB has provided us with its opinion that _____ became a rail carrier employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective September 30, 1999. The RRB also held that _____ ceased being a covered employer under the Acts effective September 29, 1999. Both businesses have the following address:

We have reviewed the opinion of the RRB and, based upon the information submitted to the RRB, we also conclude that _____ became a rail carrier employer under the Railroad Retirement Tax Act effective September 30, 1999. We also conclude that _____ ceased being a covered employer under the Act effective September 29, 1999. Please take the appropriate action regarding these businesses.

Will E. McLeod

cc: