From:
Sent: Monday, February 28, 2011 1:31:40 PM
To:
Cc:

Subject: RE: 6707A calculation request

I agree with the field. The section 6707A penalty is calculated based on the return of the person against whom the penalty is being imposed, which in this case is the transferee. Although the transferee may be liable for the additional tax under section 6901, that liability is a result of the person's receipt of assets of the transferor, i.e., a derivative liability.