

ID: CCA_2012040414392737

Number: **201219023**

Office:

Release Date: 5/11/2012

UILC: 6231.07-00

From:

Sent: Wednesday, April 04, 2012 2:39:42 PM

To:

Cc:

Subject: RE: TMP designation on amended 1065; send FPAA to terminated TMP?

(1) No. A TMP designation cannot be made on an amended return since that does not comply with the regulation under 6231(a)(7).

(2) Generally, in the absence of a new designation, the largest profits interest general partner becomes TMP by operation of law under section 6231(a)(7)(B). No partnership or service designation need occur.

(3) In any event, a generic TMP notice under Treas. Reg. 301.6223(a)-1 satisfies our requirement to send an FPAA to the TMP regardless of whether a notice is sent to a named TMP.