

Section 6110 Index

Written
Determinations
Requested After
November 1, 1976

The index is arranged by Code section with various identifying subheadings. Each ruling, technical advice memorandum, and Chief Counsel advice issued under Code section 6110 is assigned a 9-digit reference number which appears after the heading to which the ruling refers. This number also appears on the ruling, technical advice memorandum, or Chief Counsel advice itself and is to be used when requesting copies of individual rulings, technical advice memoranda, or Chief Counsel advice.

The index will be cumulated on a weekly basis. A new index will be initiated each year.

Each ruling, technical advice memorandum, or Chief Counsel advice contained in this publication is directed only to the taxpayer who requested it or with respect to whom it is issued. Section 6110(k)(3) of the Internal Revenue Code provides that letter rulings, technical advice memorandums, and Chief Counsel advice may not be used or cited as precedent.

Any person having questions about this publication or about section 6110 of the Code should contact the Chief, Disclosure and Litigation Support Branch,
CC:PA:LPD:DLS, Room 5201, 1111 Constitution Avenue N.W., Washington, DC 20224; (202) 317-6840.

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	• Value of Old Loss Corporation 201435003	382.05-00
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	• Required Distributions 201202042 201208039 201318033 201320021 201424031 201434028 201437025 201437034 201503024 201628004 201628005 201628006 201902023 201923016 201924013	401.06-00
	• <i>In General</i> 201203033 201210047 201228045 201228051 201241017 201422028 201422029 201422030 201422031 201424031 201427023 201430022 201431034 201434028 201840007 201909003	401.06-01
	• <i>Employee Dies Before Entire Interest Distributed</i> 201202042 201208039 201210045 201320021 201628004 201628005 201628006 201633025 201750004 201923016 201924013	401.06-02
	• Commencement of Benefits Under Qualified Trusts 201221033 201933006	401.11-00
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	• Exempt Trust 201417025 201821008 201831006 201936009	402.01-00
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	• Foreign Situs Trust 201341039 201406022 201419026 201430028 201436055 201452027 201502021 201505046	402.03-00
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	201204010 201206022 201206024 201208043 201218024 201221034 201229012 201233023 201330030 201330030 201511039 201639018	
	• Year of Deduction 201935011	404.11-00
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	201208039 201612001 201618011 201632015 201405032 201405033 201405034 201423043 201431038 201439006 201451065 201611022 201707001 201736018 201831004 201924013 201927009 201943020	
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	• Governmental Plan 201848011	414.07-00
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	• <i>Ineligible Corporation</i> 201849006 201936005 201938007	1361.01-05
	• Certain Trusts Permitted as Shareholders 201216034 201224013 201226019 201232003 201238017 201419009 201604009 201604010 201650007 201819002 201820001 201820009 201837012 201918002 201933001 201938003 201943015	1361.03-00
	• <i>Grantor Trusts</i> 201216025 201216034 201252007	1361.03-01

• <i>Qualified Subchapter S Trusts</i>	1361.03-02
201203011 201225005 201232003 201232027 201233014 201235008 201238017 201301004 201302004 201302005 201302006 201313002 201322016 201327009 201330012 201618003 201634019 201330012 201341003 201341009 201347014 201414006 201419009 201436039 201447007 201528020 201545015 201549001 201610012 201614002 201614003 201614019 201634019 201639010 201639011 201639012 201644006 201644007 201650007 201733001 201823003 201830004 201833010 201846001 201909005 201924006 201937005	
• <i>Electing Small Business Trusts</i>	1361.03-03
201201006 201224013 201238017 201341003 201422006 201436006 201436007 201511014 201545003 201545015 201546001 201549001 201549002 201549003 201639010 201639011 201639012 201730021 201737005 201744013 201811001 201819002 201820001 201820009 201824002 201824003 201834007 201834008 201834009 201837012 201845008 201852001 201908012 201909005 201910014 201918001 201918002 201919001 201922021 201933001 201934001 201938003 201943015	
• <i>Qualified Subchapter S Subsidiary</i>	1361.05-00
201208011 201208022 201211009 201216015 201216027 201225006 201233003 201237015 201238019 201238020 201238021 201238022 201238023 201238024 201242006 201243007 201243008 201247007 201301003 201306009 201306020 201310022 201314003 201320011 201325008 201326014 201328019 201634005 201634006 201701011 201701012 201701013 201337004 201426004 201442016 201442041 201444033 201444034 201444035 201444036 201444037 201450012 201516042 201516043 201516044 201516045 201516046 201527006 201531001 201536015 201540005 201544022 201549001 201550003 201550004 201604011 201608002 201633003 201634005 201634006 201635001 201638011 201639010 201639011 201639012 201644003 201647003 201649002 201650007 201711006 201728016 201740006 201740007 201740013 201750001 201750002 201810003 201815003 201824007 201837002 201849005 201849006 201852011 201905002 201908019 201923025 201925003 201928012 201929007 201940006 201943015	

Section 1362

Election by Small Business Corporation

1362.00-00

201201006 201205002 201205006 201206009 201206011 201211002 201211004
 201211005 201211006 201211007 201214010 201215004 201216027 201217006
 201217009 201217013 201218008 201218009 201219014 201226001 201226013
 201226017 201227003 201228003 201232005 201238006 201238014 201238015
 201239001 201242009 201243009 201246008 201247012 201248013 201250011
 201251007 201252001 201301008 201301011 201306009 201308008 201310019
 201310035 201311005 201311017 201314030 201316012 201320008 201322006
 201322016 201322036 201324011 201328004 201328026 201328029 201330017
 201330018 201632013 201634001 201634003 201634004 201634005 201634007
 201634008 201308008 201330017 201330018 201334030 201334031 201338012
 201340002 201343016 201345018 201346004 201405007 201414010 201416004
 201418008 201418044 201418045 201420002 201425003 201425008 201426011
 201429001 201431006 201437009 201442038 201442047 201443006 201443014
 201444007 201447009 201503004 201507011 201516029 201516054 201519016
 201527019 201537001 201538010 201539019 201544020 201549017 201550001
 201603015 201604005 201604006 201608007 201610005 201614025 201631007
 201633005 201633029 201634001 201634003 201634004 201634005 201634007
 201634008 201636013 201636033 201648006 201650007 201702014 201706001
 201706013 201706014 201709015 201710017 201710021 201710022 201714007
 201721008 201722019 201724013 201727001 201729016 201730002 201732015
 201732020 201743015 201747004 201750013 201801004 201801008 201804001
 201805010 201807002 201807003 201807004 201810003 201810006 201813007
 201813008 201813009 201813010 201813011 201813012 201813013 201813014
 201813015 201815003 201815004 201817015 201819002 201820001 201820009
 201821010 201821011 201822003 201824007 201825018 201830007 201831005
 201831008 201833016 201839011 201840004 201845011 201845021 201845026
 201845028 201848003 201849005 201849006 201904001 201905002 201908009
 201908019 201918002 201918003 201918004 201918011 201921006 201922001
 201922002 201922003 201925003 201933001 201935006 201935010 201936005
 201936007 201938001 201938003 201938007 **201943002 201943015 201943019**

• Eligible v. Ineligible

1362.01-00

201205002 201206009 201217009 201226017 201227003 201233001 201233004
 201234011 201238006 201238007 201252001 201301008 201301011 201310019
 201311017 201314030 201322036 201328004 201634003 201634004 201634006
 201634008 201338012 201346004 201348001 201418044 201418045 201425008
 201443006 201443014 201451016 201451019 201515013 201516003 201516009
 201519016 201528017 201537001 201608007 201611010 201634003 201634004
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 201710022 201714018 201729016 201730002 201732015 201732020 201801007
 201801008 201807002 201807003 201807004 201815003 201815004 201817015
 201823002 201831008 201839011 201845011 201849005 201849006 201852002
 201852003 201902001 201902002 201902003 201902004 201902005 201902006
 201902007 201902008 201902009 201902010 201902011 201902012 201902013
 201902014 201902015 201902016 201902017 201902018 201902019 201902020
 201902021 201905002 201908009 201918002 201918011 201922001 201922002
 201922003 201936005 201938007

• Shareholder Consent

1362.01-01

201634003 201634004 201516009 201528017 201539019 201610005 201634003
 201634004 201638003 201714018 201724021 201801004 201804001 201815003
 201824004 201831008 201905002 201928012 201933004

• Election After Termination

1362.01-02

201206009 201217009 201312023 201320012 201550022 201645007 201702014
 201709015 201710017 201710021 201710022 201729016 201732020 201801008
 201839011 201845011 201908009

• *Late Elections*

1362.01-03

201201006 201202016 201203009 201203011 201204007 201207004 201208015
 201208016 201208018 201208024 201210010 201210016 201210024 201210025
 201213003 201213009 201213020 201214008 201214011 201214017 201215001
 201216016 201216028 201216030 201217007 201217016 201219008 201219014
 201221007 201223008 201224004 201224026 201225001 201226001 201226016
 201226017 201227003 201227004 201228001 201228003 201228006 201228022
 201228027 201228028 201230015 201230016 201233001 201233002 201233004
 201233012 201234003 201234010 201234011 201234014 201234019 201234022
 201235004 201236004 201236009 201236018 201237009 201237016 201238006
 201238007 201238008 201243002 201246001 201246019 201247007 201248013
 201249006 201249009 201250011 201251010 201252013 201301002 201301008
 201301012 201302013 201307002 201310017 201310019 201310021 201310035
 201311015 201311017 201314030 201314031 201314034 201314036 201314040
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 201324001 201324007 201324012 201325001 201328001 201634008 201731007
 201335006 201335009 201335011 201336003 201337002 201338006 201338008
 201338012 201338015 201340002 201341003 201341010 201341016 201341019
 201343010 201343018 201346004 201349007 201351008 201403001 201403003
 201403010 201406006 201410018 201411005 201411013 201414011 201414012
 201418036 201420001 201420003 201422020 201425008 201436004 201440018
 201441011 201442010 201442038 201443006 201444014 201447009 201501006
 201502004 201507021 201509026 201515021 201516027 201516053 201516054
 201519007 201519009 201519013 201519025 201523006 201523010 201524019
 201524023 201528019 201541007 201550002 201550022 201603001 201604006
 201611010 201614025 201634008 201636023 201645007 201705006 201706014
 201714014 201714024 201717009 201717013 201717036 201719001 201724006
 201728016 201729002 201730016 201732015 201743016 201807002 201807003
 201807004 201807006 201822006 201823002 201837002 201845013 201845021
 201845026 201845028 201848003 201849005 201849006 201852004 201918011
 201930010 **201943002 201943019**

• *Termination of Election*

1362.02-00

201201006 201205002 201206009 201217009 201226013 201232023 201237001
 201238017 201243009 201252001 201306004 201306005 201320008 201337001
 201345021 201418008 201420002 201432006 201434010 201434011 201434012
 201434013 201434014 201443014 201444007 201450014 201508002 201523008
 201526006 201538010 201702014 201709015 201710017 201710021 201710022
 201722019 201729016 201732020 201738011 201801008 201815004 201817015
 201831005 201846001 201848004 201919005 201922001 201922002 201922003
 201933001 201935006 201938003 **201943015**

• *Ceases to be Small Business Corporation*

1362.02-02

201206009 201217009 201252001 201324004 201330017 201330018 201330017
 201330018 201426018 201432006 201443014 201444007 201508002 201516001
 201516002 201644007 201702014 201709015 201710017 201710021 201710022
 201729016 201730021 201732020 201737005 201751007 201801008 201811001
 201824001 201824002 201824003 201845008 201846001 201852001 201852002
 201908012 201908015 201908017 201918001 201918003 201919001 201922021
 201933001 201938003 **201943015**

• *Passive Investment Income*

1362.02-03

201223007 201226013 201229007 201232023 201244002 201248001 201306004
 201306005 201310008 201320008 201328006 201328007 201328008 201328009
 201328010 201328011 201328012 201328013 201328014 201328015 201328016
 201328017 201330010 201330010 201350005 201351013 201420002 201426010
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 201523005 201523008 201528028 201538010 201541003 201629001 201710013
 201722019 201738011 201827010 201831005 201848004 201935006

• S Termination Year
201507011 201706013

1362.03-00

• Inadvertent Terminations

1362.04-00

201201005 201201006 201201009 201202002 201202003 201203002 201203007
201203008 201203011 201203012 201205002 201205006 201206009 201208013
201208023 201209005 201211002 201211004 201211005 201211006 201211007
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201228018 201228024 201228025 201232004 201232007 201232009 201232026
201232027 201232029 201234002 201234007 201234008 201235008 201236003
201238007 201238008 201238014 201238015 201238017 201239001 201240012
201240014 201242009 201243009 201244002 201245001 201245002 201245014
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201308008 201308009 201308022 201310008 201312016 201313002 201314006
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201322006 201322016 201323012 201323013 201323014 201324011 201325003
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201426021 201427007 201427017 201429008 201430011 201432001 201432006
201434016 201434018 201436035 201436042 201437009 201438015 201440018
201441013 201442014 201442047 201444008 201444009 201444010 201444011
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201451016 201451017 201451019 201452014 201501007 201503004 201505008
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201528037 201530002 201530003 201530016 201531008 201532015 201533010
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201544006 201544016 201545003 201545012 201545015 201546001 201546003
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201645005 201648006 201650007 201650008 201651001 201651005 201652003
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201724013 201724021 201725022 201727001 201728020 201729016 201730002
201732020 201737005 201739007 201740001 201742003 201742015 201742016
201743001 201743006 201743012 201743015 201744013 201745008 201745009

	201745010 201745011 201747004 201748003 201748004 201750001 201750007 201750013 201751007 201752006 201801008 201805009 201805010 201810003 201811001 201811005 201813001 201813002 201813003 201813007 201813008 201813009 201813010 201813011 201813012 201813013 201813014 201813015 201815006 201817015 201819002 201819003 201820001 201820009 201821001 201821010 201821011 201822003 201823002 201823003 201824001 201824002 201824003 201824004 201824007 201824010 201825018 201827010 201830004 201830007 201830008 201831005 201832004 201833010 201833016 201840004 201845003 201845004 201845005 201846001 201846002 201848001 201848004 201849005 201849006 201850018 201852002 201852003 201852004 201903007 201905002 201908012 201908015 201908017 201908019 201909005 201910005 201910014 201918001 201918002 201918003 201918004 201919005 201921007 201924006 201925003 201926009 201928012 201930023 201931004 201933001 201933004 201934001 201935006 201935010 201936007 201937005 201938001 201938003 201941003 201941004 201941005 201941006 201941007 201943015 201943018	
Section 1366	Pass-Thru of Items to Shareholders 201327009 201333008 201429025	1366.00-00
Section 1367	Adjustment to Basis of Stock of, and Indebtedness Owing, Shareholders 201237017 201421015 201440013	1367.00-00
Section 1368	Distributions 201207002 201216027 201328025	1368.00-00
	• Accumulated Adjustments Account 201421015 201440013 201446021	1368.01-00
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86) 201202014 201219003 201314008 201348007 201722008	1374.00-00
Section 1381	Organizations to Which Part Applies 201507004 201515012 201524002 201524003 201524004 201529004 201536011 201545001	1381.00-00
	• Certain Other Cooperatives 201228014	1381.02-00
Section 1382	Taxable Income of Cooperatives 201208008 201216011 201219001 201234018 201250009 201413002 201601004 201619003 201750003	1382.00-00
	• Gross Income 201852003 201902001	1382.01-00
	• Patronage Dividends 201228035 201809005	1382.02-00
	• Exceptions 201407003 201852001	1382.04-00
Section 1385	Amounts Includible in Patron's Gross Income 201604008 201750003	1385.00-00
Section 1388	Definitions; Special Rules 201234018 201750003 201809005	1388.00-00
Section 1402	Definitions 201402004	1402.00-00
	• Net Earnings From Self-Employment 201916005	1402.01-00
	• <i>Limited Partners</i> 201436049 201640014	1402.01-03

	• Ministers, Members of Religious Orders, Christian Science Practitioners (Election) 201340015	1402.05-00	
Section 1441	Withholding of Tax on Nonresident Aliens (Required v. Not Required) 201202001 201311006 201727005 201727006	1441.00-00	
	• Who must Withhold	1441.01-00	
	• <i>Liability of Withholding Agent</i> 201428007	1441.01-02	
	• Income Subject to Withholding v. Not Subject to Withholding	1441.02-00	
	• <i>Sale or Exchange of Capital Assets</i> 201343020	1441.02-03	
	• Exemptions from Withholding	1441.03-00	
	• <i>Effectively Connected Income</i> 201428007	1441.03-01	
Section 1442	Withholding of Tax on Foreign Corporations (Required v. Not Required) 201808010	1442.00-00	
Section 1443	Foreign Tax-Exempt Organizations (Subject v. Not Subject to Withholding)	1443.00-00	
	• Income Subject to Withholding 201808010	1443.02-00	
Section 1461	Liability for Withheld Tax 201503013	1461.00-00	
Section 1501	Privilege to File Consolidated Returns (May v. May Not File Consolidated Return) 201213012 201306007 201726015	1501.00-00	
Section 1502	Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns) 201201010 201213012 201213013 201214012 201214015 201217014 201243014 201250017 201307001 201311010 201312027 201749002 201341018 201342004 201402001 201414009 201418033 201418043 201930012 201936004	1502.00-00	
	• Liability for Tax 201644018	1502.06-00	
	• Overall Foreign Loss Recapture Rules 201452002	1502.08-00	
	• Intercompany Transactions 201208034 201243013 201312027 201612006 201336018 201339001 201402001 201411007 201507006 201524016 201528007 201540001 201603002 201605014 201610004 201722012 201723008 201723009 201726012 201828006 201830005 201936004	1502.13-00	
	• <i>Stock of Members</i> 201210018 201228011 201312027 201322002 201341022 201605013 201722012 201810001 201810002	1502.13-01	
	• <i>Obligations of Members</i> 201707006	1502.13-02	
	• <i>Anti-Avoidance</i> 201640018	1502.13-03	
	• Stock, Bonds, and Other Obligations of Members 201208034	1502.14-00	R

• Limitation on Built-in Losses 201232011	1502.15-00
• Excess Losses 201749002 201350007 201441010 201930012	1502.19-00
• Consolidated Net Operating Loss Deduction 201206006 201208001 201208032 201214019 201223003 201223004 201224003 201226006 201226008 201226020 201228004 201228007 201228008 201230003 201230004 201230005 201233006 201234012 201234023 201235005 201236015 201237010 201242008 201242010 201245009 201247005 201248012 201249004 201249010 201250002 201301009 201305005 201305010 201306001 201310024 201310025 201312025 201315002 201322034 201323011 201328028 201330001 201632002 201330001 201332003 201335007 201336002 201336004 201336008 201338019 201340003 201342005 201342008 201344005 201349008 201349009 201351016 201352005 201411011 201412004 201418016 201418020 201418033 201418043 201423003 201424001 201424015 201426024 201431005 201431008 201431009 201431010 201431012 201431013 201431014 201431015 201431016 201434001 201438004 201438019 201442013 201444015 201448001 201503008 201521007 201523011 201527038 201530015 201532004 201532030 201544021 201601010 201605018 201610010 201610011 201611005 201613013 201616006 201620009 201628003 201630003 201630004 201636016 201637002 201637003 201644005 201651011 201703010 201717039 201717040 201738005 201752007 201817017 201825002 201825015 201837003 201901006 201901007 201903016 201904014 201905004	1502.21-00
• Basis of Property 201828006	1502.31-00
• Investment Adjustment 201213013 201214012 201339001 201411007 201430002 201550028 201641019 201921003 201936004	1502.32-00
• Earnings and Profits 201411007 201936004	1502.33-00
• Accumulated Earnings Tax on Separate Basis 201316008	1502.47-00
• Life and Non-Life 201210015 201213012	1502.50-00
• Filing Requirements 201202008 201202009 201214015 201217014 201225010 201232015 201249007 201250017 201251008 201307001 201310009 201311010 201313019 201317005 201319005 201323010 201324010 201329006 201332002 201336007 201338017 201338025 201341008 201347011 201407012 201411016 201442018 201507003 201514007 201524008 201527036 201529001 201533004 201541006 201542005 201548016 201550033 201601007 201606019 201631004 201648012 201648014 201702019 201711008 201716007 201717018 201717023 201728002 201730008 201732025 201738006 201744011 201751012 201802009 201813006 201819008 201825016 201827007 201833009 201839009 201902029 201921011 201929001 201933009	1502.75-00
• When Group Remains in Existence 201228002 201314028 201350007 201424010 201505006 201933009	1502.75-10
• Common Parent No Longer in Existence 201250017 201326006	1502.75-11
• Taxable Year of Members of Group 201520001 201414015 201520001 201843002 201933009	1502.76-00
• Income Allocation 201235003 201542007	1502.76-01

	• Common Parent Agent for Subsidiaries 201522005 201552025	1502.77-00
	• Separate Return Years 201251003 201324004	1502.79-00
	• Applicability of Other Provisions of Law 201650013	1502.80-00
	• Consolidated Returns for Subsequent Years 201324004	1502.89-00
	• Election to File Separate Returns	1502.90-00
	• <i>Changes in Affiliated Groups</i> 201251003	1502.90-01
	• Carryover and Carryback 201228005 201312019	1502.92-00
	• Intercompany Transactions 201208034 201402001	1502.93-00
	• Stock Transactions 201208034	1502.94-00
	• Application of Section 382 with Respect to a Consolidated Group 201414009 201511012	1502.98-00
	• <i>Apportionment</i> 201207003 201414009	1502.98-05
	• <i>Limitation on Use of Credits and Net Capital Losses</i> 201435012	1502.98-08
	• Regulations Governing Consolidated Returns--Issue Not Contained in Present List 201216018 201249005 201250010 201252006 201323008 201329001 201329007 201329008 201329009 201329010 201329011 201329012 201329013 201329014	1502.99-00
Section 1504	Definitions 201213012 201214020 201251003 201306007 201306008 201310016 201429010 201451009 201504007 201641012 201815008 201927002	1504.00-00
	• Affiliated Group v. Not an Affiliated Group 201306007 201306008 201310016 201315019 201325010 201328027 201430002 201435005 201505006 201538015 201649012 201709004	1504.01-00
	• Includible Corporation v. Not an Includible Corporation 201213012 201214020 201251003 201429007 201433013 201815008	1504.02-00
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i> 201248002	1504.02-01
	• <i>Maquiladora ISP - IRC Section 1504(d) Election</i> 201248002	1504.02-02
Section 1563	Definitions and Special Rules 201405009	1563.00-00
Section 2001	Imposition and Rate of Tax 201205001 201208005 201243006 201418017 201418031 201418032 201516008 201516020 201530008 201530009 201530010 201530011 201530012 201530013 201531003 201531004 201531005 201531006 201531007 201532008 201532009 201532010 201532011 201532012 201532013 201732029 201817012 201817013 201817014 201817016	2001.00-00

Section 2010	Unified Credit Against Estate Tax	2010.00-00
	201612005 201612009 201612010 201618006 201632001 201632003 201632005 201632014 201632017 201632018 201701008 201410013 201418009 201421002 201532002 201537010 201550032 201603007 201603021 201604014 201604016 201605009 201605010 201605011 201606013 201608010 201613010 201613011 201614020 201614021 201614023 201614027 201614028 201614030 201615009 201615010 201617003 201620008 201621007 201622027 201624002 201624014 201624017 201624018 201624019 201626015 201626018 201626019 201630001 201630007 201630012 201631001 201631002 201631003 201633002 201633008 201638013 201638018 201640004 201641005 201641008 201641009 201641010 201642014 201642015 201642016 201642017 201642018 201652008 201652009 201702020 201702025 201702028 201702030 201702031 201702032 201702033 201703006 201703007 201703008 201706011 201709012 201709013 201709014 201709019 201709022 201710004 201710010 201710011 201710014 201712009 201716008 201716013 201716015 201717004 201717007 201718024 201718025 201718027 201719013 201719015 201719017 201719019	
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• Associations v. Corporations 7701.01-00
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	• <i>Investment Trusts</i> 201226019	7701.03-10
	• <i>Fixed Investment Trusts</i> 201229003 201750009	7701.03-11
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	• Fiduciary v. Agent 201302026	7701.05-00
	• Indian Tribal Government 201739011	7701.20-00
	• Definition of Resident Alien	7701.21-00
	• <i>Coordination with Income Tax Treaties</i> 201247013	7701.21-20
	• Treatment of Certain Contracts For Services, etc.	7701.22-00
	• <i>Factors: Lease vs. Service Contract</i> 201525007	7701.22-01
	• Motor Vehicle Operating Leases	7701.25-00
	• <i>Terminal Rental Adjustment Clause</i> 201304005 201337012 201404007 201727002	7701.25-04
	• Taxable Mortgage Pools 201330008 201330008 201425001 201425010	7701.26-00
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Section 7702	Life Insurance Contract Defined 201230009 201443015 201736019	7702.00-00
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	• Cash Value Accumulation Test 201230009	7702.02-00
Section 7702A	Modified Endowment Contracts 201443015 201617004	7702A.00-00
Section 7702B	Treatment of Qualified Long-Term Care Insurance 201845020	7702B.00-00
	• Definition 201213016 201930025	7702B.02-00
Section 7703	Determination of Marital Status	7703.00-00
	• Married Individuals Living Apart 201334041	7703.02-00

Section 7704	Certain Publicly Traded Partnerships Treated as Corporations	7704.00-00
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	• Inadvertent Termination 201818001 201819001 201822002	7704.04-00
	• Transitional Rule for Existing Partnerships 201314025	7704.05-00
Section 7803	Other Personnel 201902031	7803.00-00
Section 7805	Rules and Regulations 201517026 201517027 201716001 201716025 201716026 201716029 201716030 201716033 201716036 201716038 201716041 201716042 201717020 201717022 201717024 201717025 201717031 201717032 201717034 201717035 201718030 201718032 201719021 201927012	7805.00-00
	• Prospective Application of Changes in Regulations	7805.01-00
	• <i>Prospective Application of Rulings</i> 201537023	7805.01-01
	• Reversals of Regulations or Rulings With Retroactive Effect 201413013	7805.03-00
	• Retroactive Effect of Regulation	7805.04-00
	• <i>Retroactive Application of Rulings</i> 201216051 201233011 201245017 201927012	7805.04-01
	• Effect of Private Rulings 201927012	7805.05-00
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Section 7871	Indian Tribal Governments Treated As States For Certain Purposes 201445002 • Charitable Purposes 201525014 201551003	7871.00-00 7871.01-00

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Section 7872	Treatment of Loans with Below Market Interest Rates 201426002	7872.00-00

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• Section 42; Low-Income Housing Credit 9100.01-00

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• *R and D Expenditures* 9100.02-03

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• *ITC Expenditures* 9100.02-04

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• *Development Expenditures* 9100.02-05

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• Section 146; Volume Cap 9100.03-00

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• Section 168; MACRS 9100.04-00

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• Section 266; Carrying Charges 9100.05-00

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• Section 338(g); Election Under Section 1.338-1T(c)(1) 9100.06-00

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• Section 338(h)(1); Election Under Section 1.338(h)(10)-1T 201429016 201435002 201437005 201530017	9100.07-00
• Section 367; Foreign Corporations 201725012	9100.08-00
• Section 442; Accounting Periods 201224024 201305009 201311019 201311020 201312026 201347017 201436044 201438007 201447021 201452004 201524001 201535005 201537013 201552021 201604012 201606007 201606008 201709021 201712012 201726003 201735004 201802010 201802011 201802012 201802013 201819009 201922024	9100.09-00
• Section 446 201224016 201224017 201303002 201311012 201318007 201343006 201343007 201343008 201343009 201344003 201451010 201507007 201516026 201528031 201532007 201534006 201550018 201645009 201723010 201726006 201726008 201728019 201736016 201740005 201740016 201815013 201917004 201931002	9100.10-00
• <i>Accounting Methods</i> 201221001 201224005 201224016 201224017 201226005 201226007 201226009 201239004 201303002 201311012 201318007 201343006 201343007 201343008 201343009 201344003 201351011 201409004 201423018 201426023 201451010 201507007 201516026 201528031 201532007 201550018 201636038 201645009 201723010 201726006 201726008 201728019 201736016 201750008 201815013 201850013 201917004 201920005 201931002 201933003 201937014	9100.10-01
• Section 472; LIFO Election 201208033 201232012 201232013 201233005 201317006 201333001 201342009 201405006 201448017 201610014 201801002 201830009 201850017	9100.11-00
• Section 663; Special Rules Applicable to Sections 661 and 662 201245008 201348008	9100.12-00
• Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 201201007 201201014 201213006 201213024 201214006 201240008 201250012 201251004 201311016 201314013 201632006 201632007 201632008 201632009 201337010 201341002 201352008 201410014 201410019 201410020 201410021 201410022 201410023 201410024 201410025 201410026 201426012 201433010 201436045 201438008 201440003 201442003 201443011 201448002 201505003 201506001 201506002 201508003 201510024 201514002 201519023 201523007 201525008 201528027 201530004 201532001 201532014 201532019 201532020 201543002 201544007 201544008 201544009 201548012 201603018 201605007 201610002 201620002 201620003 201622010 201624005 201624016 201624020 201626007 201629002 201630013 201630014 201631006 201631008 201631009 201638009 201645001 201645008 201648005 201649003 201649005 201705008 201709005 201709006 201709009 201717014 201717038 201718013 201719006 201719007 201722013 201726002 201726010 201728015 201729015 201736004 201736007 201738007 201744003 201748001 201748002 201750011 201804006 201808013 201815002 201816006 201817018 201818007 201819005 201819010 201823001 201826005 201826007 201826008 201830010 201833007 201839004 201840003 201840005 201841003 201846003 201848014 201851006 201851007 201852013 201902024 201902025 201904010 201904011 201904012 201904013 201909004 201918012 201919007 201919009 201919010 201920010 201924008 201924012 201926003 201927012 201929009 201929016 201933002 201934002 201942010 201943008 201943017	9100.15-00
• Section 911; Citizens or Residents of the United States Living Abroad 201420015 201433009 201507016 201539018 201650006	9100.17-00
• Extension of Time For Filing Return 201442018	9100.19-00

• Section 1502; Election to File Consolidated Return	9100.20-00
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• Section 6(c)(3) of PL 97-354; Qualified Oil Corporation	9100.21-00
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9100.22-00

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• Regulation Section 1.337(d); Loss on Stock of Subsidiary 9100.29-00

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• Reg. 301.7701-3 Classification of Certain Business Entities

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	• Revenue Procedures 201351023	9102.01-00
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	• Authority 201736021	9103.01-00
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	• <i>China</i> 201438020	9114.03-07
	• <i>Cyprus</i> 201343019	9114.03-08
	• <i>Italy</i> 201212008	9114.03-20
	• <i>United Kingdom</i> 201231010	9114.03-42
	• <i>Israel</i> 201247013	9114.03-44
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	• <i>Property of Estate (Section 1207)</i> 201411026	9115.11-07
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	• Issues Related to Statutes Other Than Contained in Internal Revenue Code 201320020 201614032	9999.92-00
	• <i>Freedom of Information Act</i> 201515028 201621011 201631011	9999.92-01
	• <i>Privacy Act</i> 201742023	9999.92-02
	• Constitutional Issues Not Related to Code Sections	9999.94-00
	• <i>Tax Protest Cases</i> 201909010	9999.94-02
	• Substance v. Form Issues Not Contained in Present List 201311023 201501012	9999.97-00

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