Office of Chief Counsel Internal Revenue Service **Memorandum**

Number: 200528025

Release Date: 7/15/2005 CC:TEGE:EOEG:ET1 POSTN-118079-05

- UILC: 3231.01-00
 - date: April 11, 2005
 - to: Director, Submission Processing Cincinnati, OH Attn: Entity Unit
- from: Office of Division Counsel/Associate Chief Counsel (Tax Exempt & Government Entities)

subject: Railroad Retirement Tax Act 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 dated , that the following business became an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that

employer under the Railroad Retirement Tax Act on the appropriate action regarding this business.

became an . Please take

Janine Cook

CC: