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

Number: 200530025

Release Date: 7/29/2005

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date: April 25, 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 ceased to be an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective with the close of business on :

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that . ceased to be an employer under the Railroad Retirement Tax Act on when it apparently merged into its parent company , a covered employer. Please take the appropriate action regarding this business.

Janine Cook