

Office of Chief Counsel
Internal Revenue Service
memorandum

Number: 200543055

Release Date: 10/28/2005

CC:TEGE:EOEG:ET1
POSTN-125377-05

UILC: 3231.01-00

date: July 13, 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 _____:

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB and our subsequent phone conversation with the taxpayer, we believe that _____ merely changed its name, effective _____, after it became affiliated with the _____.

_____ . The new name with the _____ is _____.

_____ is a division within _____.

POSTN-125377-05

2

Please take the appropriate action regarding this business.

Janine Cook

cc: