



empt Organizations) relating to issues on which the Internal Revenue Service will not issue advance letter rulings or determination letters.

SECTION 2. BACKGROUND

In Rev. Proc. 94-76, 1994-2 C.B. 825, currently reflected in section 5.15 of Rev. Proc. 96-3, the IRS stated that while it was studying whether certain transactions qualifying as corporate reorganizations under § 368 circumvent the purposes of *General Utilities* repeal, the IRS would not issue advance rulings on the tax consequences of the transactions under study. In notice 96-6, the IRS announced that this study is being closed.

SECTION 3. PROCEDURE

Rev. Proc. 96-3 is amplified by adding to section 3 (Areas In Which Rulings Or Determination Letters Will Not Be Issued) the provision presently in section 5.15, and is modified by deleting the provision from section 5 (Areas Under Extensive Study).

DRAFTING INFORMATION

For further information regarding this revenue procedure, contact Keith Stanley of the Office of Assistant Chief Counsel (Corporate) at (202) 622-7530 (not a toll-free call).

26 CFR 601.201: Rulings and determination letters.

(Also §§ 368; 1.368-1.)

Rev. Proc. 96-22

SECTION 1. PURPOSE

This revenue procedure amplifies and modifies Rev. Proc. 96-3, 1996-1 I.R.B. 82, which sets forth areas of the Internal Revenue Code under the jurisdiction of the Associate Chief Counsel (Domestic) and the Associate Chief Counsel (Employee Benefits and Ex-