

**INTERNAL REVENUE SERVICE**

Number: **INFO 2002-0087**

Release Date: 6/28/2002

UILC: 1362.00-00



CC:PSI:1-GENIN-122100-02

May 28 2002

**[REDACTED]**:

We are responding to correspondence, submitted by **[REDACTED]**, CPA, and forwarded to our office by the Internal Revenue Service in Memphis, Tennessee. The information submitted indicates that you are seeking late S corporation relief, pursuant to Revenue Procedure 97-48, for an effective date of October 1, 1999.

Based on the facts as presented and your account history, you are eligible for relief under section 4.01 of Rev. Proc. 97-48. We have taken action on your behalf to ensure that the requested effective date is entered on your account. If you fail to receive confirmation of the account update under separate cover within 60 days from the date of this letter, please contact our office at the above telephone number.

In addition, the IRS provides a special website, [www.irs.gov/smallbiz](http://www.irs.gov/smallbiz) which is dedicated to providing useful information to small business taxpayers.

Please keep this letter with your tax records and feel free to provide a copy of it to your authorized representative. We hope that the above information proves helpful.

Sincerely yours,

**/s/ Dianna K. Miosi**

DIANNA K. MIOSI  
Chief, Branch 1  
Associate Chief Counsel  
(Passthroughs and Special Industries)