



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

OFFICE OF
CHIEF COUNSEL

AUG 22 2001

Number: **200148019**
Release Date: 11/30/2001
CC:TEGE:EOEG:ET1 - COR-127919-01
UILC: 3231.01-00

MEMORANDUM FOR DIRECTOR, INTERNAL REVENUE SERVICE CENTER
Kansas City, MO
Attn: Entity Control

FROM: Office of Division Counsel/Associate Chief Counsel
(Tax Exempt and Government Entities)

SUBJECT: CC:TEGE:EOEG:ET1 - COR-127919-01
Railroad Retirement Act Tax 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 that the following business is not an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act and that service performed by its employees are not covered under the Acts:

We have reviewed the opinion of the RRB and, based upon the information submitted to the RRB, we also conclude that _____ is not an employer under the Railroad Retirement Tax Act and that service performed by its employees are not covered. Please take the appropriate action regarding this business.

Will E. McLeod

CC: