

Internal Revenue Service

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Department of the Treasury
Washington, DC 20224

Third Party Communication: None
Date of Communication: Not Applicable

Person To Contact:

, ID No.

Telephone Number:

Refer Reply To:

CC:PSI:B01

GENIN-143194-04

Date:

April 22, 2005

RE

Dear [REDACTED]:

This is in response to your letter dated July 14, 2004. The company captioned above (the taxpayer) wishes to terminate its S election as of January 1, 2000. According to the information provided, a statement revoking the S election was sent to the Service on October 18, 2000.

Under § 1362(d)(1)(C) of the Internal Revenue Code, a revocation made during the taxable year and on or before the 15th day of the 3rd month thereof shall be effective on the 1st day of such taxable year, and a revocation made during the taxable year but after such 15th day shall be effective on the 1st day of the following taxable year.

Therefore, the S election of the taxpayer is terminated as of January 1, 2001. The Service Center has been advised to make the necessary adjustments to the file on the taxpayer.

Sincerely,

/s/ Dianna K. Miosi

Dianna K. Miosi
Chief, Branch 1
(Passthroughs & Special Industries)