

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:1

GENIN-104831-05

Date:

June 27, 2005

LEGEND:

Taxpayer =

Dear :

This letter responds to correspondence dated December 29, 2004, submitted on behalf of Taxpayer, requesting information regarding relief for late entity classification and S corporation elections.

Taxpayer may submit a private letter ruling request to the National Office to obtain relief for a late entity classification election (Form 8832) pursuant to section 301.9100 of the Procedural and Administration Regulations. Section 1362(b)(5) provides relief for late S corporation elections in situations in which there was reasonable cause for the failure to timely make an election. The procedures for requesting relief for a late entity classification and S corporation elections are outlined in Revenue Procedure 2005-1 (2005-1 I.R.B. 1). We have enclosed a copy of Revenue Procedure 2005-1 for your convenience.

If you have any additional questions, please call our office at (202) 622-3050.

Sincerely,

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

Enclosure (1)

Rev. Proc. 2005-1