ID: CCA_2022070113172307 Third Party Communication: None
UILC: 9999.00-00 Date of Communication: Not Applicable

Number: **202241006**
Release Date: 10/14/2022

From: [redacted]
Sent: Friday, July 1, 2022 1:17:23 PM
To: [redacted]
Cc:
Bcc:
Subject: Request for Advice

This email responds to your request for advice regarding a position took on its tax return for the and tax years. Exam is evaluating whether to make an adjustment to taxpayer's return.

This issue had been analyzed and extensively coordinated by the time taxpayer took its position on its returns for the and tax years, so FIP was familiar with this issue when we learned of this proposed adjustment. Given the many challenges with this issue, a conclusion was reached during the prior coordination that guidance would have had to have been provided to ensure similarly situated taxpayers were not treated differently. That is, the result reached during the prior coordination was that regulations would have been necessary to support an adjustment to taxpayer's return. A fully coordinated decision was previously made not to propose such regulations. Accordingly, FIP does not support making an adjustment to the taxpayer's return with respect to this issue.