

**INTERNAL REVENUE SERVICE**

[REDACTED]

November 20, 2000

Number: **INFO 2000-0403**  
Release Date: 12/29/2000  
UIL 1362.00-00

[REDACTED]:

This letter responds to your correspondence requesting late S corporation relief under section 1362(b)(5) of the Internal Revenue Code, seeking an effective date of March 26, 1997.

In Rev. Proc. 97-48 (copy attached) the Internal Revenue Service provides special procedures that permit taxpayers in certain situations to obtain automatic late S corporation relief instead of applying for a private letter ruling. The facts presented in your situation appear to be covered by section 4.01 of Rev. Proc. 97-48. To receive relief under the provisions of this revenue procedure, normally taxpayers must follow the procedural requirements described in section 4.01(2). However, we have intervened on your behalf and asked staff at the Cincinnati Service Center to update your records to reflect March 26, 1997, as your S corporation effective date. If you fail to receive a confirmation letter from the service center within the next 60 days, please notify this office at the telephone number listed above.

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  
Office of the Assistant Chief Counsel  
(Passthroughs and Special Industries)

Attachment:  
Rev. Proc. 97-48