

**INTERNAL REVENUE SERVICE**

Number: **INFO 2001-0186**

Release Date: 9/28/2001

[REDACTED]

[REDACTED]  
[REDACTED]

CC:PSI:1-COR-132302-01

July 11, 2001

UILC 1362.00-00

[REDACTED]:

We are responding to correspondence, submitted on your behalf by [REDACTED] [REDACTED] [REDACTED] requesting relief in order to establish January 1, 1998, as the effective date for your S corporation election. The information submitted explains that an original election was mailed timely but not received by the Internal Revenue Service.

In Revenue Procedure 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 are covered by this revenue procedure and you have been granted relief. You should have recently received a letter confirming this fact. If not, please contact Mrs. Rose at the telephone number provided above.

If you have computer web access, you may wish to visit [www.irs.gov/smallbiz](http://www.irs.gov/smallbiz) for specialized tax information, products, and forms relating to small businesses.

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  
Associate Chief Counsel  
(Passthroughs and Special Industries)

Enclosure:  
Rev. Proc. 97-48