

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-144130-04

Date:

January 04, 2005

Legend

Taxpayer =

[REDACTED]

Dear [REDACTED]:

This letter responds to undated correspondence, submitted on behalf of Taxpayer, requesting information regarding relief for a late S corporation election.

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 election are outlined in Revenue Procedure 2004-1 (2004-4 I.R.B. 1). We have enclosed a copy of Revenue Procedure 2004-1 for your convenience.

If you have any additional questions, please contact our office

Sincerely,

/s/ Dianna k. Miosi

Dianna K. Miosi
Branch Chief, Branch 1
Office of Associate Chief Counsel
(Passthroughs and Special Industries)

Enclosure (1)
Rev. Proc. 2004-1