

Office of Chief Counsel
Internal Revenue Service
Memorandum

Number: **200551022**

Release Date: 12/23/2005

CC:TEGE:EOEG:ET1
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date: September 9, 2005

to: Director, Submission Processing
Cincinnati, OH
Attn: Entity Unit

from: Office of Division Counsel/Associate Chief Counsel
(Tax Exempt & Government Entities)

subject: Railroad Retirement Tax Act Status

In accordance with the coordination procedure established between the Service and the Railroad Retirement Board (RRB), the RRB has provided us with its opinion that the following business ceased to be an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective _____ :

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that

_____ be an employer under the Railroad Retirement Tax Act effective _____

_____ ceased to
_____ . However,

we note that the RRB indicates that employees were compensated on _____ and
subsequently transferred to _____ parent company,
on _____. Please take the appropriate action regarding this business.

Janine Cook

CC: