

**Office of Chief Counsel
Internal Revenue Service
Memorandum**

Number: **200519052**

Release Date: 5/13/2005

CC:TEGE:EOEG:ET1

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UILC: 3231.01-00

date: January 25, 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 became an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act on _____ :

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that the _____ ,
became an employer under the Railroad Retirement Tax Act on _____ ,
assuming that it is not disregarded as a separate entity for federal tax purposes.
Please take the appropriate action regarding this business.

Janine Cook