



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

OFFICE OF
CHIEF COUNSEL

APR 23 2001

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CC:TEGE:EOEG:ET1 - COR-105029-01
UILC: 3231.01-00

MEMORANDUM FOR

FROM: Office of Division Counsel/Associate Chief Counsel
(Tax Exempt and Government Entities)

SUBJECT: CC:TEGE:EOEG:ET1 - COR-105029-01
Railroad Retirement Act Tax 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 is not a covered employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act and that services performed by its employees are not covered under the Acts:

We have reviewed the opinion of the RRB and, based upon the information submitted to the RRB, we also conclude that is
not an employer under the Railroad Retirement Tax Act and that services performed by its employees are not covered under the Act. Please take the appropriate action regarding this business.

Will E. McLeod

CC: