1999 IRS / TREASURY BUSINESS PLAN ANNOTATED (AS OF 1/28/2000)

OFFICE OF TAX POLICY and INTERNAL REVENUE SERVICE

1999 PRIORITY GUIDANCE PLAN

Consolidated Returns

- 1. Final regulations regarding transactions involving intercompany obligations.
- Final regulations regarding reporting for the date an S corporation is acquired by a consolidated group.
 ! Completed. See TD 8842 in FR on 11/10/99.
- 3. Final regulations regarding the application of section 382 to a consolidated group. ! Completed. See TD 8824 in FR on 7/2/99.
- 4. Final regulations regarding the application of separate returns limitation year (SRLY) provisions to the use of a member-s tax attributes by a consolidated group. ! Completed. See TD 8823 in FR on 7/2/99.
- 5. Modification of Treas. Reg. section 1.1502-77T regarding authorization to act for the consolidated group.

Corporations and Their Shareholders

- Regulations regarding conversion of C corporation to RIC or REIT status. See Notice 88-19.
 Completed. See TD 8872 in FR on 1/ /00, FILED with FR on 1/21/00.
- 2. Proposed regulations under sections 338 and 1060. ! Completed. See NPRM REG-107069-97 in FR on 8/10/99 and TD 8858 in FR on 1/7/00.
- 3. Guidance regarding nonqualified preferred stock. ! Completed. See NPRM REG -105089-99 in FR, FILED with FR on 1/21/00.
- 4. Guidance under section 355(d). ! Completed. See NPRM REG-106004-98 in FR on 5/3/99.
- 5. Guidance under section 355(e). ! Completed. See NPRM REG-116733-98 in FR on 8/24/99.
- 6. Final regulations under section 368 regarding the effect of redemptions and extraordinary dividends on continuity of interest.
- Guidance under section 368 regarding the Asolely for voting stock[®] requirement in certain reorganizations.
 ! Completed. See NPRM REG-115086-98 in FR on 6/14/99 and NT 2000-1 in IRB 2000-2 on 1/10/00.

- 8. Reconsideration of ruling guidelines in Rev. Proc.77-37 and Rev. Proc. 86-42 related to the continuity of interest and continuity of business enterprise requirements for a corporate reorganization under section 368.
- 9. Guidance under section 368 regarding mergers of a corporation with a disregarded entity.
- Guidance under section 368 regarding the effect of a stock redemption program on continuity of interest.
 ! Completed. See Rev Rul 99-58 in IRB 1999-52 on 12/27/99.
- 11. Final regulations under section 1032 regarding the treatment of a disposition by one corporation of the stock of another corporation in a taxable transaction.
- 12. Guidance under section 1374 regarding sales of timber.

Employee Benefits

A. Retirement Benefits

- 1. Guidance relating to plan loans under section 72(p).
- Guidance relating to consolidated employee plans compliance resolution system (EPCRS).
 Completed. See Rev Proc 2000-16 in IRB 2000-6 on 2/7/00 (released 1/21/00).
- Guidance on methods of correcting plan qualification violations relating to section 401(a)(17) and other qualification provisions.
 ! Completed. See Rev Proc 99-31 in IRB 1999-34 on 8/23/99.
- 4. Guidance relating to rollovers involving qualified plans under section 401(a)(31).
- 5. Final regulations relating to remedial amendment periods under section 401(b). ! Completed. See TD 8871 in FR, SENT to FR on 1/21/00.
- 6. Guidance relating to cash or deferred arrangements under section 401(k). ! Completed. See NT 2000-3 in IRB 2000-4 on 1/24/00 (released 1/6/00).
- 7. Guidance on automatic enrollment relating to salary reduction contributions. ! Completed. See Rev Rul 2000-8 in IRB 2000-7 on 2/14/00 (released 1/27/00).
- 8. Guidance under section 401(m). ! Completed. See NT 2000-3 in IRB 2000-4 on 1/24/00 (released 1/6/00).
- Guidance on methods of correcting failures to satisfy the section 401(k) and (m) average deferral percentage and actual contribution percentage tests.
 ! Completed. See Rev Proc 99-31 in IRB 1999-34 on 8/23/99.
- Guidance relating to the use of electronic technologies in the administration of qualified plans.
 ! Completed. See TD 8873 in FR, SENT to FR on 1/21/00.
- 11. Update of Notice 92-48 relating to the model notice under section 402(f). ! Completed. See NT 2000-11 in IRB 2000-6 on 2/7/00 (released 1/21/00).

- 12. Guidance on methods of determining and allocating earnings in connection with correction of a failure to make timely plan contributions. ! Completed. See Rev Proc 99-31 in IRB 1999-34 on 8/23/99.
- 13. Final regulations relating to Roth IRAs under section 408A. ! Completed. See TD 8816 in FR on 2/4/99.
- 14. Guidance relating to reporting with respect to Roth IRAs under section 408A. ! Completed. See AN 99-106 in IRB 1999-46 on 11/15/99.
- 15. Guidance relating to the determination of earnings on excess IRA contributions.
- 16. Guidance on methods of correcting plan qualification violations relating to the exclusion of eligible employees from participation in a profit-sharing plan or in a cash or deferred arrangement under section 401(k). ! Completed. See Rev Proc 99-31 in IRB 1999-34 on 8/23/99.
- 17. Guidance relating to the application of section 411(a). ! Completed. See Notice in FR on 10/20/99.
- 18. Proposed regulations relating to the application of the anticutback rules in certain circumstances under section 411(d)(6).
- 19. Final regulations under sections 411 and 417 relating to cashouts of benefits.
- 20. Guidance relating to funding issues under section 412. ! Completed. See Rev Proc 99-45 in IRB 1999-49 on 12/6/99.
- Announcement relating to review of mortality tables under section 412(1)(7)(c)(ii)(III).
 ! Completed. See AN 2000-7 in IRB 2000-6 on 2/7/00 (released 1/21/00).
- 22. Guidance relating to the definition of highly compensated employee under section 414(q).
 ! Completed. See NT 2000-3 in IRB 2000-4 on 1/24/00 (released 1/6/00).
- Guidance on methods of correcting plan qualification violations relating to amounts in excess of the limits under section 415.
 ! Completed. See Rev Proc 99-31 in IRB 1999-34 on 8/23/99.
- 24. Guidance relating to the effect of the repeal of section 415(e). ! Completed. See NT 99-44 in IRB 1999-35 on 8/30/99.
- 25. Guidance relating to the application of the retroactive annuity starting date provisions under section 417(a)(7).
- Guidance relating to the application of plan qualification rules to certain duplicate pension accruals.
 ! Completed. See Rev Rul 99-51 in IRB 1999-50 on 12/13/99.
- 27. Guidance providing a one-year extension of the remedial amendment period for plan amendments relating to recent legislation.
 ! Completed. See Rev Proc 99-23 in IRB 1999-16 on 4/19/99.
- 28. Revenue procedure regarding the determination letter program for plan amendments relating to recent legislation.

- 29. Revised master and prototype program procedures for qualified plans. ! Completed. See Rev Proc 2000-20 in IRB 2000-6 on 2/7/00 (released 1/21/00).
- **30.** Guidance relating to the application of section 1042(e) to transfers to partnerships.
- 31. Guidance on waiver of section 4971(b) excise tax in standard terminations of defined benefit plans.
- 32. Announcement relating to electronic transmittal of Form W-4P. ! Completed. See AN 99-6 in IRB 1999-4 on 1/25/99.

B. Health Care, Other Benefits and Employment Taxes

- Final regulations revising Table I under section 79 relating to tax treatment of group-term life insurance.
 ! Completed. See TD 8821 in FR on 6/3/99.
- 2. Guidance under section 83.
- 3. Guidance under section 125 relating to cafeteria plans.
- 4. Guidance under section 132(f)(4). ! Completed. See NPRM REG-113572-99 in FR on 1/27/00.
- 5. Guidance relating to the accounting method changes required by the addition of section 404(a)(11).
 ! Completed. See NT 99-16 in IRB 1999-13 on 3/29/99 and Rev Proc 99-26 in IRB 1999-24 on 6/14/99.
- 6. Guidance on issues relating to nonqualified deferred compensation. ! Completed. See AN 2000-1 in IRB 2000-2 on 1/10/00.
- Guidance on application of reporting and withholding rules to funded governmental section 457(b) plans.
 ! Completed. See AN 2000-1 in IRB 2000-2 on 1/10/00.
- 8. Guidance on deferred compensation plans of entities not subject to income tax.
- 9. Final regulations under section 3121(v) on application of FICA to nonqualified deferred compensation.
 ! Completed. See T.D. 8814 in FR on 1/29/99.
- Final regulations under section 3221(d) regarding the exception to the railroad supplemental annuity tax.
 ! Completed. See TD 8832 in FR on 8/6/99.
- Final regulations under section 3306(r) on application of FUTA to nonqualified deferred compensation.
 ! Completed. See TD 8815 in FR on 1/29/99.
- 12. Final regulations under section 4980B regarding COBRA requirements for health care continuation coverage. ! Completed. See TD 8812 in FR on 2/3/99.

- 13. Proposed regulations under section 4980B regarding certain COBRA requirements for health care continuation coverage. ! Completed. See NPRM REG-121865-98 in FR on 2/3/99.
- 14. Guidance on information reporting with respect to election workers. ! Completed. See Rev Rul 2000-6 in IRB 2000-6 on 2/7/00 (released 1/19/00).
- 15. Guidance regarding nondiscrimination requirements under section 9802 relating to the Health Insurance Portability and Accountability Act (HIPAA).
- 16. Guidance under section 9802(c) relating to HIPAA.
- 17. Guidance on issues arising under subtitle K (HIPAA). ! Completed. See Notice in FR on 10/25/99 and Notice in FR on 12/15/99.

Excise Taxes

- 1. Guidance under section 4051 regarding the definition of highway vehicle in Treas. Reg. sections 145.4051 and 48.4061(a)-1.
- 2. Final regulations under section 4081 regarding kerosene excise tax and registration for heavy vehicles.
- 3. Final regulations under section 4251 regarding prepaid telephone cards. ! Completed. See TD 8855 in FR on 1/7/00.
- 4. Guidance under sections 4261 and 4271 regarding the transportation of persons and property by air.
- 5. Modification of Treas. Reg. section 41.6001 regarding reporting of vehicle identification numbers.
- 6. Guidance under section 6302 regarding deposit of excise taxes. ! Completed. See ANPRM REG-103827-99 in FR on 1/7/00.

Exempt Organizations

- 1. Guidance on the implications of issue advocacy and political intervention for section 501(c)(4) and section 527 organizations.
- 2. Guidance on the treatment of subsidiary income for purposes of the 85-percent member income test under section 501(c)(12).
- 3. Guidance under section 507 regarding termination of private foundation status.
- 4. Notice requesting comments regarding the application of existing rules on unrelated business taxable income, lobbying expenditures, and political intervention to Internet activities of tax-exempt organizations.
- Final regulations under section 513 regarding travel and tour activities of taxexempt organizations.
 ! Completed. See TD 8874 in FR, SENT to FR on 1/27/00.

- 6. Guidance under section 513(i) regarding corporate sponsorship payments received by tax-exempt organizations.
- 7. Final regulations under section 529 regarding qualified state tuition programs.
- 8. Guidance regarding compliance by certain educational institutions with withholding and reporting requirements for payments to certain non-resident aliens.
- 9. Final regulations under section 4958 regarding excise taxes for certain excess benefit transactions.
- 10. Final regulations under section 6104 regarding the disclosure of certain documents by certain tax-exempt organizations. ! Completed. See TD 8818 in FR on 4/9/99.
- 11. Guidance under section 6104 regarding the disclosure of certain documents by private foundations.
 ! Completed. See NPRM REG-121946-98 in FR on 8/10/99 and TD 8861 in FR on 1/13/00.
- 12. Guidance regarding harassment campaign determinations under section 6104.

Financial Institutions and Products

- 1. Guidance regarding the treatment of loan origination costs.
- 2. Guidance under section 446 regarding notional principal contracts and other financial instruments.
- 3. Proposed regulations under section 475 regarding electing traders and dealers. ! Completed. See NPRM REG-104924-98 in FR on 1/28/99.
- 4. Revenue Procedure under section 475 regarding electing traders and dealers. ! Completed. See Rev Proc 99-17 in IRB 1999-7 on 2/16/99.
- 5. Guidance under section 562(c) regarding the treatment of waivers and reimbursements in certain regulated investment companies. ! Completed. See Rev Proc 99-40 in IRB 1999-46 on 11/15/99.
- 6. Guidance under section 860A regarding legending requirements for REMIC s. ! Completed. See NPRM REG-100905-97 in FR on 5/19/99.
- Guidance under section 860H regarding financial asset securitization investment trusts.
 ! Completed. See NPRM REG-100276-97 in FR, SENT to FR on 1/21/00.
- 8. Guidance under sections 1001 and 1275 regarding an election to treat a substitution of debt instruments, in certain circumstances, as a realization event.
 ! Completed. See Rev Proc 99-18 in IRB 1999-11 on 3/15/99.
- Final regulations under section 1092(c)(4) regarding certain equity options that are listed on an exchange but do not have standard terms.
 ! Completed. See TD 8866 in FR on 1/25/00, FILED with FR on 1/21/00.

- 10. Guidance under section 1259 regarding constructive sales treatment for appreciated financial positions.
- 11. Guidance on the treatment of certain items relating to credit card transactions and on income from pools of prepayable obligations, including pools of credit card receivables.
- 12. Final regulations under section 1275 regarding inflation indexed bonds. ! Completed. See TD 8838 in FR on 9/7/99.
- 13. Additional guidance under section 1275. ! Completed. See TD 8840 in FR on 11/3/99.
- 14. Final regulations under section 7701(I) regarding lease stripping.
- 15. Final regulations under section 7701(I) regarding financing arrangements involving fast-pay stock. ! Completed. See TD 8853 in FR on 1/10/00.

General Tax Issues

- 1. Final regulations under section 41 regarding the research credit.
- 2. Guidance under section 41 regarding computation of the research and experimentation tax credit in a controlled group. ! Completed. See NPRM REG-105606-99 in FR on 1/4/00.
- Final regulations under section 42 relating to compliance and administrative errors.
 ! Completed. See TD 8859 in FR on 1/14/00.
- Guidance under sections 51 and 51A regarding the consequences of certain transition employment.
 ! Completed. See NT 99-51 in IRB 1999-40 on 10/4/99.
- 5. Guidance under section 102 regarding individual development accounts. ! Completed. See Rev Rul 99-44 in IRB 1999-44 on 11/1/99.
- Proposed regulations under section 110 regarding the information to be reported by a lessor and lessee.
 ! Completed. See NPRM REG-106010-98 in FR on 9/20/99.
- Proposed regulations under section 118 regarding the definition of contribution in aid of construction.
 ! Completed. See NPRM REG-106012-98 in FR on 12/20/99.
- 8. Guidance under section 121 regarding the exclusion of gain on the sale of a principal residence.
- 9. Guidance under section 162 regarding certain leasing transactions . ! Completed. See Rev Rul 99-14 in IRB 1999-13 on 3/29/99.
- 10. Reconsideration of Rev. Rul. 66-9 and Rev. Rul. 73-51. ! Completed. See Rev Rul 99-56 in IRB 1999-51 on 12/20/99.

- 11. Guidance under section 170 regarding transactions involving insurance contracts. ! Completed. See NT 99-36 in IRB 1999-26 on 6/28/99.
- 12. Final regulations under section 197 regarding the amortization of intangibles. ! Completed. See TD 8865 in FR on 1/25/00, FILED with FR on 1/20/00.
- 13. Guidance under section 213 regarding medical expense deductions. ! Completed. See Rev Rul 99-28 in IRB 1999-25 on 6/21/99.
- 14. Guidance under section 1031. ! Completed. See NT 2000-4 in IRB 2000-3 on 1/18/00.

Gifts, Estates, and Trusts

- Guidance under sections 1(h)(11) and 664 regarding the treatment of capital gains taken into account by charitable remainder trusts.
 ! Completed. See NT 99-17 in IRB 1999-14 on 4/5/99.
- 2. Proposed regulations under section 645 regarding an election by certain revocable trusts to be treated as part of the associated estate.
- Final regulations under section 663 regarding the application of the separate share rule under subchapter J.
 ! Completed. See TD 8849 in FR on 12/28/99.
- 4. Final regulations under section 671 regarding reporting requirements for widely held fixed investment trusts.
- 5. Final regulations under section 2001(f) regarding the adequate disclosure of gifts. ! Completed. See TD 8845 in FR on 12/3/99.
- Final regulations under section 2056 regarding the treatment of administrative expenses paid out of estate income.
 ! Completed. See TD 8846 in FR on 12/3/99.
- Guidance in addition to Rev. Rul. 89-89 regarding the qualification of distribution(s) from an individual retirement account as qualified terminable interest property under section 2056(b)(7).
 ! Completed. See Rev Rul 2000-2 in IRB 2000-3 on 1/18/00.
- 8. Proposed regulations under section 2057 regarding the estate tax exclusion for certain family owned business interests.
- 9. Guidance under section 2601 regarding modifications to a trust qualifying for a grandfather exception to the generation skipping transfer tax. ! Completed. See NPRM REG-103841-99 in FR on 11/18/99.
- 10. Guidance under section 2702 regarding the use of notes to satisfy the annuity payment requirement of a grantor retained annuity trust. ! Completed. See NPRM REG-108287-98 in FR on 6/22/99.
- 11. Regulations under section 7520 regarding actuarial tables. ! Completed. See TD 8819 in FR on 4/30/99.

Final regulations under sections 7701(a)(30) and (31) regarding the definition of a domestic trust.
 ! Completed. See T.D. 8813 in FR on 2/2/99.

Insurance Companies and Products

- 1. Guidance concerning issues related to Rev. Rul. 81-225. ! Completed. See Rev Proc 99-44 in IRB 1999-48 on 11/29/99.
- 2. Guidance regarding captive insurance companies.
- 3. Guidance under section 807.
- 4. Update of Rev. Proc. 92-25. ! Completed. See NT 2000-9 in IRB 2000-5 on 1/31/00 (released 1/13/00).
- Final regulations under section 832(b)(4) regarding accounting for gross premiums written and unearned premiums.
 ! Completed. See TD 8857 in FR on 1/5/00.
- Revenue procedure regarding uniform closing agreements for modified endowment contracts.
 ! Completed. See Rev Proc 99-27 in IRB 1999-23 on 6/7/99.

International Issues

A. Foreign Tax Credit

- 1. Proposed regulations regarding foreign tax credits. (See Notice 98-5.)
- 2. Regulations under section 904(d) regarding the application of the foreign tax credit limitation to separate categories of income.
- Final regulations under sections 904(f) and 1502 regarding the treatment of overall foreign loss accounts upon leaving a consolidated group.
 Completed. See TD 8833 in FR on 8/11/99.

B. Subpart F/Deferral

- 1. Proposed regulations under Subpart F on the treatment of branches, transparent entities, and related matters. (See Notice 98-35.) ! Completed. See NPRM REG-113909-98 in FR on 7/13/99.
- 2. Proposed regulations under subpart F on the treatment of income earned through partnerships.

3. Guidance under the passive foreign investment company provisions.

-10-

! Completed. See TD 8870 in FR, SENT to FR on 1/21/00; also NPRM REG-113744-98 in FR on 2/2/99 ; NT 99-14 in IRB 1999-11 on 3/15/99 and NPRM REG-115795-97 in FR, SENT to FR 1/20/00.

C. Inbound Transactions

1. Guidance under section 894(c) regarding treaty benefits for payments through hybrid entities and related matters.

 Guidance regarding withholding on payments to foreign persons.
 ! Completed. See Rev Proc 2000-12 in IRB 2000-4 on 1/24/00 (released 1/7/00); NT 99-8 in IRB 1999-5 on 2/1/99; NT 99-25 in IRB 1999-20 on 5/17/99; and TD 8856 in FR on 12/30/99.

D. Outbound Transactions

- 1. Guidance under section 367(e) on certain outbound transfers of stock. ! Completed. See TD 8834 in FR on 8/9/99.
- 2. Notice under section 987 regarding the determination of income and exchange gain or loss of a branch with a functional currency different from that of its home office.
- Proposed regulations under section 988 on hyperinflationary instruments.
 ! Completed. See TD 8860 in FR on 1/13/00 and NPRM REG- 116567-99 in FR on 1/13/00.
- 4. Announcement regarding the treatment of certain foreign currency denominated contingent debt instruments under section 988. ! Completed. See AN 99-76 in IRB 1999-31 on 8/2/99.
- 5. Guidance on foreign sales corporation redeterminations. ! Completed. See NT 99-23 in IRB 1999-20 on 5/17/99 and NT 99-24 in IRB 1999-20 on 5/17/99.
- 6. Guidance on reporting requirements relating to foreign partnerships and partners.
 ! Completed. See TD 8850 in FR on 12/28/99; TD 8851 in FR on 12/28/99 and Finalization of Form 8865 (Information Return of U.S. Persons With Respect to Certain Foreign Partnerships).
- Final regulations under section 6038B on transfers to foreign partnerships.
 ! Completed. See TD 8817 in FR on 2/5/99 and TD 8850 in FR on 12/28/99 (see # 6 above).

E. Sourcing and Expense Allocation

- Proposed regulations under section 861 on the sourcing of compensation for labor or personal services, including fringe benefits.
 ! Completed. See NPRM REG-208254-90 FILED with FR on 1/21/00.
- 2. Guidance on the sourcing of income from communications activities.
- 3. Guidance under section 864(e) on the allocation of interest expense.

F. Other

- 1. Final regulations under section 367(b). ! Completed. See TD 8862 in FR on 1/24/00 and TD 8863 in FR on 1/24/00.
- 2. Guidance under section 482 relating to transfer pricing. ! Completed. See Rev Proc 99-32 in IRB 1999-34 on 8/23/99.
- 3. Guidance on foreign trusts. ! Completed. See TD 8831 in FR on 8/10/00.
- 4. Final regulations under sections 861 through 865 regarding the source and character as effectively connected of income from cross-border financial transactions.
- 5. Guidance concerning income earned from shipping. ! Completed. See NPRM REG-208280-86 in FR, SENT to FR on 1/21/00.
- 6. Final regulations under section 936 on substantial new lines of business. ! Completed. See TD 8868 in FR on 1/25/00.

Partnerships

- 1. Guidance regarding the application of the partnership provisions to capital gains. ! Completed. See NPRM REG-106527-98 in FR on 8/9/99.
- Guidance regarding allocation of cancellation of indebtedness income under section 704.
 ! Completed. See Rev Rul 99-43 in IRB 1999-42 on 10/18/99.
- 3. Guidance regarding mergers and divisions of partnerships. ! Completed. See NPRM REG-111119-99 in FR on 1/11/00.
- 4. Guidance under section 752 regarding allocation of debt. ! Completed. See NPRM REG-103831-99 in FR on 1/13/00.
- Final regulations under sections 743 and 755 regarding basis adjustments following sales of partnership interests.
 ! Completed. See TD 8847 in FR on 12/15/99.
- 6. Guidance under section 1032 regarding transfer by partnership of partner stock. ! Completed. See Rev Rul 99-57 in IRB 1999-51 on 12/20/99 and NT 99-57 in IRB 1999-51 on 12/20/99.
- Final regulations under section 6031 regarding the filing of federal tax returns by certain foreign partnerships.
 ! Completed. See TD 8841 in FR on 11/12/99.
- 8. Proposed regulations regarding TEFRA partnership proceedings. ! Completed. See NPRM REG-106564-98 in FR on 1/26/99 and TD 8808 in FR on 1/26/99.

Final regulations under section 7701 regarding elective conversion of an entity from partnership status to corporate status and vice versa.
 ! Completed. See TD 8844 in FR on 11/29/99.

Subchapter S

- 1. Final regulations under section 1361 regarding qualified subchapter S subsidiaries. ! Completed. See TD 8869 in FR on 1/25/00, FILED with FR on 1/20/00.
- 2. Guidance under section 1361 regarding electing small business trusts.
- Final regulations under section 1366 regarding the pass-through of items to S corporation shareholders.
 ! Completed. See TD 8852 in FR on 12/22/99.

Tax Accounting

- 1. Guidance under section 167 regarding the income forecast method.
- 2. Guidance under section 195 regarding investigatory costs. ! Completed. See Rev Rul 99-23 in IRB 1999-20 on 5/17/99.
- 3. Guidance regarding the treatment of ISO 9000 costs. ! Completed. See Rev Rul 2000-4 in IRB 2000-4 on 1/24/00 (released 1/6/00).
- 4. Guidance regarding the treatment of costs of removing property that is replaced with other property, cyclical maintenance costs, sales commissions paid to obtain new customers, and mutual fund launch costs. (It is anticipated that two of these projects will be completed in 1999 and two will be completed in 2000.)
- 5. Final regulations under section 263A regarding farmers.
- 6. Regulations under section 263A regarding the historic absorption ratio method. ! Completed. See NPRM REG-113910-98 in FR on 5/24/99.
- Regulations under section 274 regarding the receipt threshold and standard mileage deductions for leased automobile business use.
 ! Completed. See TD 8864 in FR on 1/26/00, FILED with FR on 1/21/00.
- 8. Guidance regarding change in accounting periods. ! Completed. See NT 99-19 in IRB 1999-16 on 4/19/99 and Rev Proc 2000-11 in IRB 2000-3 on 1/18/00.
- 9. Update of Rev. Proc. 98-60 regarding automatic method change procedures. ! Completed. See Rev Proc 99-49 in IRB 1999-52 on 12/27/99.
- 10. Guidance under section 446 regarding the definition of method of accounting.
- 11. Guidance under section 446 regarding general procedures applicable to voluntary and involuntary changes in methods of accounting. ! Completed. See Rev Proc 99-28 in IRB 1999-29 on 7/19/99.
- 12. Guidance under sections 446 and 451 regarding the accrual acceptance method.

- 13. Guidance under sections 446 and 471 regarding the cash method of accounting.
- Proposed regulations regarding the application of the installment method provisions to capital gains.
 ! Completed. See NPRM REG-110524-98 in FR on 1/22/99.
- Final regulations regarding the application of the installment method provisions to capital gains. (See project 14 above.)
 ! Completed. See TD 8836 in FR on 8/23/99.
- 16. Proposed regulations under section 460 regarding long-term contracts. ! Completed. See NPRM REG- 208156-91 in FR on 5/5/99.
- 17. Final regulations under section 467 regarding certain payments for the use of property.
 ! Completed. See TD 8820 in FR on 5/17/99 and NPRM REG-103694-99 in FR on 5/18/99.
- 18. Update of Rev. Proc. 75-21.
- 19. Guidance under section 468B(g) regarding certain escrow funds. ! Completed. See NPRM REG-209619-93 in FR on 2/1/99.
- 20. Guidance under section 472 regarding the dollar-value LIFO inventory method.
- 21. Clarification of the treatment of delay rentals under sections 263A and 612. ! Completed. See NPRM REG-103882-99 in FR, SENT to FR on 1/21/00.
- 22. Guidance regarding contract termination payments. ! Closed without publication.
- 23. Guidance under section 1301 regarding income averaging by farmers. ! Completed. See NPRM REG-121063-97 in FR on 10/8/99.

Tax Administration

- Final regulations under section 6011(e)(2) regarding magnetic media filing by partnerships.
 Completed. See TD 8843 in FR on 11/12/99.
- Guidance under section 6011 regarding elimination of the ability to use magnetic tape for the reporting of Federal tax deposits.
 ! Completed. See NT 99-42 in IRB 1999-35 on 8/30/99.
- 3. Guidance under section 6011 regarding Form 1040 E-file and Form 1040 on-line. ! Closed without publication.
- 4. Guidance under section 6011 regarding on-line filing of Form 941. ! Completed. See Rev Proc 99-39 in IRB 1999-43 on 10/25/99.
- 5. Guidance under section 6015 regarding equitable relief. ! Completed. See Rev Proc 2000-15 in IRB 2000-5 on 1/31/00 (released 1/18/00).
- 6. Guidance under section 6015 regarding election by spouse to limit joint and several liability.

- Guidance under section 6041 regarding combined information reporting for parties in reorganizations.
 ! Completed. See Rev Proc 99-50 in IRB 1999-52 on 12/27/99.
- 8. Guidance under sections 6071 and 6651 regarding conforming changes required by the Internal Revenue Service Restructuring and Reform Act of 1998 (RRA >>>8). ! Completed. See NPRM REG-105279-99 in FR on 1/27/00, SENT to FR on 1/21/00.
- 9. Guidance under sections 6041 and 6045 regarding reporting responsibilities of a middleman payer.
- 10. Guidance under section 6045(f) regarding payments to attorneys. ! Completed. See NPRM REG-105312-98 in FR on 5/21/99.
- 11. Guidance under section 6050S regarding reporting of tuition and student loan interest.
- 12. Temporary regulations under section 6103(j) regarding census information. ! Completed. See T.D. 8811 in FR on 1/25/99.
- Final regulations under section 6109 regarding taxpayer identification numbers in connection with adoptions.
 ! Completed. See TD 8839 in FR on 9/22/99.
- 14. Guidance under section 6109 regarding alternative identification numbers for tax return preparers.
 ! Completed. See TD 8835 in FR on 8/12/99.
- 15. Guidance under section 6111 regarding the registration of confidential corporate tax shelters.
- 16. Guidance under section 6212 regarding last known address. ! Completed. See NPRM REG-104939-99 in FR on 11/22/99.
- 17. Final regulations under section 6302 regarding the \$1000 deposit threshold. ! Completed. See TD 8822 in FR on 6/17/99.
- 18. Regulations under section 6302(h) regarding the electronic federal tax payment system.
 ! Completed. See NPRM REG-100729-98 in FR on 3/23/99 and TD 8828 in FR on 7/13/99.
- 19. Proposed regulations under section 6323 regarding withdrawal of federal tax liens. ! Completed. See NPRM REG-101519-97 in FR on 6/30/99.
- 20. Proposed regulations under section 6343 regarding the return of property.
- 21. Final regulations under section 6402 to conform existing regulations to the shift of offset responsibility set forth in the Debt Collection Act. ! Completed. See TD 8837 in FR on 9/7/99.
- 22. Reconsideration of Rev. Rul. 88-98. ! Completed. See Rev Rul 99-40 in IRB 1999-40 on 10/4/99.
- 23. Guidance under section 6404(e) regarding abatement of interest.

! Closed without publication.

- 24. Guidance under section 6404(g) regarding suspension of interest. ! Closed without publication.
- 25. Guidance under section 6511 regarding disability suspension of time periods. ! Completed. See Rev Proc 99-21 in IRB 1999-17 on 4/26/99.
- 26. Guidance under section 6621(d) regarding certain procedural requirements for net zero rate interest for periods prior to the date of enactment of RRA >98. ! Completed. See Rev Proc 99-19 in IRB 1999-13 on 3/29/99.
- 27. Additional guidance under section 6621(d) regarding procedural requirements for net zero rate interest for periods prior to the date of enactment of RRA >98. ! Completed. See Rev Proc 99-43 in IRB 1999-47 on 11/22/99.
- 28. Guidance under section 6621(d) regarding net zero rate interest after date of enactment of RRA >98.
- 29. Guidance under section 7122 regarding offers in compromise. ! Completed. See NPRM REG-116991-98 in FR on 7/21/99 and TD 8829 in FR on 7/21/99.
- 30. Guidance under section 7123 regarding early referral of issues to the IRS Office of Appeals.
 ! Completed. See Rev Proc 99-28 in IRB 1999-29 on 7/19/99.
- 31. Guidance under section 7123 regarding expansion of the mediation program of the IRS Office of Appeals.
- 32. Guidance under section 7123 regarding a pilot arbitration program of the IRS Office of Appeals.
 ! Completed. See AN 2000-4 in IRB 2000-3 on 1/18/00.
- 33. Guidance under section 7430 regarding qualified offers.
- 34. Guidance under section 7508A regarding disaster relief. ! Completed. See NPRM REG-101492-98 in FR on 12/30/99.
- 35. Guidance under section 7602 regarding third party contacts.
- 36. Guidance under section 7609 regarding third party record keepers.
- 37. Guidance under section 1001 of RRA >98 regarding ex parte communications between appeals officers and other IRS employees.
 ! Completed. See NT 99-50 in IRB 1999-40 on 10/4/99.
- Review guidance previously issued to determine if such guidance is still appropriate and useful.
 ! Completed. See e.g., IR-1999-84 (Changes to the Tip Reporting Alternative Commitment agreement);
 NT 99-57 in IRB 1999-51 on 12/20/99 (Section 705);
 NT 99-6 in IRB 1999-3 on 1/19/99 (Employment taxes for disregarded entities).

Tax-Exempt Bonds

- 1. Regulations under section 141 regarding allocation and accounting provisions.
- 2. Regulations under section 141 regarding refundings.
- 3. Guidance under section 148 regarding investment type property. ! Completed. See NPRM REG-113526-98 on FR on 8/25/99.
- 4. Guidance under section 148 regarding guaranteed investment contracts. ! Completed. See NPRM REG-105565-99 in FR on 8/27/99.
- 5. Guidance under section 1397E regarding qualified zone academy bonds. ! Completed. See NPRM REG-105327-99 in FR on 7/1/99 and TD 8826 in FR on 7/1/99.

APPENDIX A

- 1. Guidance under section 263A(f) regarding related party interest capitalization.
- 2. Guidance relating to the application of certain plan qualification rules to taxexempt organizations.
- 3. Guidance under section 446 regarding the effect of credit risk on swap valuations.
- 4. Guidance under section 451 regarding the treatment of advance payments.
- 5. Guidance under section 817A.
- 6. Guidance under section 1092 regarding straddles where one position is bigger than the offsetting position.
- 7. Guidance under 1275 regarding original issue discount issues, including reporting requirements and reopenings.
- 8. Guidance regarding the applicability of the corporate alternative minimum tax to a consolidated group.
- 9. Guidance regarding estimated tax payments by corporations.
- 10. Final regulations under section 4980B regarding COBRA requirements for health care continuation coverage.
- 11. Final regulations under section 9801 (the Health Insurance Portability and Accountability Act (HIPAA)).
- 12. Guidance regarding Circular 230.

APPENDIX B

1999 Regularly Scheduled Publication Items

<u>January</u>

- Revenue Procedure updating the procedures for issuing private letter rulings, determination letters, and information letters on specific issues under the jurisdiction of the Chief Counsel.
 ! Completed. See Rev Proc 99-1 in IRB 1999-1 on 1/4/99.
- Revenue Procedure updating the procedures for furnishing technical advice to district directors and chiefs, appeals offices, in the areas under the jurisdiction of the Chief Counsel.
 ! Completed. See Rev Proc 99-2 in IRB 1999-1 on 1/4/99.
- Revenue Procedure updating the previously published list of "no-rule" issues under the jurisdiction of the Associate Chief Counsel (Domestic) and the Associate Chief Counsel (Employee Benefits and Exempt Organizations) on which advance letter rulings or determination letters will not be issued.
 Completed. See Rev Proc 99-3 in IRB 1999-1 on 1/4/99.
- 4. Revenue Procedure updating the previously published list of "no-rule" issues under the jurisdiction of the Associate Chief Counsel (International) on which advance letter rulings or determination letters will not be issued. ! Completed. See Rev Proc 99-7 in IRB 1999-1 on 1/4/99.
- Revenue Procedure updating procedures for furnishing letter rulings, general information letters, etc., on matters relating to sections of the Code under the jurisdiction of the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations).
 Completed. See Rev Proc 99-4 in IRB 1999-1 on 1/4/99.
- 6. Revenue Procedure updating procedures for furnishing technical advice by the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations). ! Completed. See Rev Proc 99-5 in IRB 1999-1 on 1/4/99.
- Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
 Completed. See Rev Rul 99-2 in IRB 1999-2 on 1/11/99.
- Revenue Ruling setting forth the prevailing state assumed interest rates provided for the determination of reserves under section 807 for contracts issued in 1998 and 1999.
 Completed. See Rev Rul 99-10 in IRB 1999-10 on 3/8/99.
- Revenue Ruling providing the dollar amounts, increased by the 1999 inflation adjustment, for section 1274A.
 ! Completed. See Rev Rul 98-58 in IRB 1998-52 on 12/28/98.
- Revenue Ruling setting forth the amount that section 7872 permits a taxpayer to lend to a qualified continuing care facility without incurring imputed interest, adjusted for inflation.
 Completed. See Rev Rul 98-59 in IRB 1998-52 on 12/28/98.
- 11. Revenue Procedure providing procedures for limitations on depreciation deductions for owners of passenger automobiles first placed in service during the calendar year; amounts to be included in income by lessees of passenger automobiles first leased during the calendar year; and the maximum allowable

value of employer-provided automobiles first made available to employees for personal use in the calendar year. ! Completed. See Rev Proc 99-14 in IRB 1999-5 on 2/5/99.

- 12. Revenue Procedure providing the domestic asset/liability percentages and domestic investment yield percentages for taxable years beginning after December 31, 1998, for foreign companies conducting insurance business in the U.S. ! Completed. See Rev Proc 99-30 in IRB 1999-31 on 8/2/99.
- 13. Revenue Procedure updating procedures for issuing determination letters on the qualified status of employee plans under sections 401(a), 403(a), 409, and 4975 of the Code.
 ! Completed. See Rev Proc 99-6 in IRB 1999-1 on 1/4/99.
- 14. Revenue Procedure updating the user fee program as it pertains to requests for letter rulings, determination letters, etc. on matters under the jurisdiction of the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations). ! Completed. See Rev Proc 99-8 in IRB 1999-1 on 1/4/99.
- 15. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in January 1999.
 ! Completed. See NT 99-7 in IRB 1999-4 on 1/25/99.
- 16. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-4 in IRB 1999-4 on 1/25/99.

February

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-8 in IRB 1999-6 on 2/8/99.
- 2. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-9 in IRB 1999-7 on 2/16/99.
- Revenue Ruling under section 165 listing the Presidentially declared major disaster areas for the preceding calendar year.
 Completed. See Rev Rul 99-13 in IRB 1999-10 on 3/8/99.
- 4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in February 1999.
 ! Completed. See NT 99-11 in IRB 1999-8 on 2/22/99.

<u>March</u>

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-11 in IRB 1999-10 on 3/8/99.
- Notice providing resident population of the states for determining the calendar year state housing credit ceiling under section 42(h), and the private activity bond volume cap under section 146.
 ! Completed. See NT 99-10 in IRB 1999-6 on 2/8/99.

- 3. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of gualified low-income buildings or interests therein during the period January through March, 1999. ! Completed. See Rev Rul 99-18 in IRB 1999-14 on 4/5/99.
- 4. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period April through June, 1999. ! Completed. See Rev Rul 99-16 in IRB 1999-13 on 3/29/99.
- 5. Notice providing a tentative determination under section 809 of the differential earnings rate for 1998 and the recomputed differential earnings rate for 1997 for use by mutual life insurance companies to compute their income tax liabilities for 1998.

! Completed. See NT 99-13 in IRB 1999-10 on 3/8/99.

- 6. Revenue Ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the first half of 1999 for use in valuing personal flights on employer-provided aircraft. ! Completed. See Rev Rul 99-12 in IRB 1999-12 on 3/22/99.
- 7. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in March 1999. ! Completed. See NT 99-15 in IRB 1999-12 on 3/22/99.
- 8. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-15 in IRB 1999-12 on 3/22/99.

April

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-17 in IRB 1999-14 on 4/5/99.
- 2. Revenue Ruling providing the average annual effective interest rates charged by each Farm Credit Bank District. ! Completed. See Rev Rul 99-20 in IRB 1999-17 on 4/26/99.
- 3. Notice providing the inflation adjustment factor, nonconventional fuel source credit, and reference price for the calendar year that determines the availability of the credit for producing fuel from a nonconventional source under section 29. ! Completed. See NT 99-18 in IRB 1999-16 on 4/19/99.
- 4. Revenue Procedure providing a current list of countries and the dates those countries are subject to the section 911(d)(4) waiver and guidance to individuals who fail to meet the eligibility requirements of section 911(d)(1) because of adverse conditions in a foreign country. ! Completed. See Rev Proc 99-20 in IRB 1999-14 on 4/5/99.
- 5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in April 1999. ! Completed. See NT 99-21 in IRB 1999-17 on 4/26/99.

6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-19 in IRB 1999-15 on 4/12/99.

<u>May</u>

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-21 in IRB 1999-18 on 5/3/99.
- Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in May 1999.
 ! Completed. See NT 99-28 in IRB 1999-21 on 5/24/99.
- 3. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-22 in IRB 1999-19 on 5/10/99.
- Revenue Procedure under section 6012 regarding the magnetic media filing of Forms 1040NR for 1998.
 Completed. See Rev Proc 99-25 in IRB 1999-21 on 5/24/99.
- 5. Revenue Procedure providing guidance for use of the national and area median gross income figures by issuers of qualified mortgage bonds and mortgage credit certificates in determining the housing cost/income ratio under section 145. ! Completed. See Rev Proc 99-22 in IRB 1999-15 on 4/12/99.

<u>June</u>

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-25 in IRB 1999-23 on 6/7/99.
- Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period April through June, 1999.
 Completed. See Rev Rul 99-24 in IRB 1999-21 on 5/24/99.
- Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period July through September, 1999.
 Completed. See Rev Rul 99-27 in IRB 1999-25 on 6/21/99.
- 4. Notice providing the calendar year inflation adjustment factor and reference prices for the renewable electricity production credit under section 45. ! Completed. See NT 99-26 in IRB 1999-21 on 5/24/99.
- 5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in June 1999.
 ! Completed. See NT 99-33 in IRB 1999-26 on 6/28/99.
- 6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-26 in IRB 1999-24 on 6/14/99.

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-29 in IRB 1999-27 on 7/6/99.
- Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in July 1999.
 Completed. See NT 99-38 in IRB 1999-31 on 8/2/99.
- 3. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-30 in IRB 1999-28 on 7/12/99.

August

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-32 in IRB 1999-31 on 8/2/99.
- Revenue Procedure providing the amounts of unused housing credit carryover allocated to qualified states under section 42(h)(3)(D) for the calendar year.
 Completed. See Rev Proc 99-33 in IRB 1999-34 on 8/23/99.
- Notice providing the inflation adjustment factor to be used in determining the enhanced oil recovery credit under section 43 for tax years beginning in the calendar year.
 ! Completed. See NT 99-45 in IRB 1999-37 on 9/13/99.
- 4. Notice providing the applicable percentage to be used in determining percentage depletion for marginal properties under section 613A for the calendar year. ! Completed. See NT 99-46 in IRB 1999-37 on 9/13/99.
- 5. Revenue Procedure providing the loss payment patterns and discount factors for the 1999 accident year to be used for computing unpaid losses under section 846. ! Completed. See Rev Proc 99-36 in IRB 1999-42 on 10/18/99.
- Revenue Procedure providing the salvage discount factors for the 1999 accident year to be used for computing discounted estimated salvage recoverable under section 832.
 ! Completed. See Rev Proc 99-37 in IRB 1999-42 on 10/18/99.
- Revenue Ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the second half of 1999 for use in valuing personal flights on employer-provided aircraft.
 ! Completed. See Rev Rul 99-33 in IRB 1999-34 on 8/23/99.
- Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in August 1999.
 ! Completed. See NT 99-39 in IRB 1999-34 on 8/23/99.
- 9. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

July

! Completed. See Rev Rul 99-34 in IRB 1999-33 on 8/16/99.

September

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-37 in IRB 1999-36 on 9/7/99.
- 2. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of gualified low-income buildings or interests therein during the period July through September, 1999. ! Completed. See Rev Rul 99-38 in IRB 1999-36 on 9/7/99.
- 3. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period October through December 1999.

! Completed. See Rev Rul 99-36 in IRB 1999-35 on 8/30/99.

4. Revenue Ruling providing the determination under section 809 of the differential earnings rate for 1998 and the recomputed differential earnings rate for 1997 for use by mutual life insurance companies to compute their income tax liabilities for 1998.

! Completed. See Rev Rul 99-35 in IRB 1999-34 on 8/23/99.

- 5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in September 1999. ! Completed. See NT 99-49 in IRB 1999-39 on 9/27/99.
- 6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-31 in IRB 1999-37 on 9/13/99.
- 7. Notice setting forth a list of designated private delivery services for purposes of the "timely mailing as timely filing/paying" rule of section 7502 of the Code. ! Completed. See NT 99-41 in IRB 1999-35 on 8/30/99.
- 8. Announcement on whether the number of medical savings accounts has exceeded the applicable statutory limits under the Health Portability and Accountability Act of 1996. ! Completed. See AN 99-95 in IRB 1999-42 on 10/18/99.
- 9. Revenue Procedure under section 62 regarding the deduction and deemed substantiation of federal standard mileage amounts. ! Completed. See Rev Proc 99-38 in IRB 1999-43 on 10/25/99.

October

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-41 in IRB 1999-40 on 10/4/99.
- 2. News release setting forth cost-of-living adjustments effective January 1, 2000, applicable to the dollar limits on benefits under qualified defined benefit pension plans and other provisions affecting certain plans of deferred compensation.

! Completed. See News Release IR-1999-80 on 10/19/99.

- Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in October 1999.
 ! Completed. See NT 99-52 in IRB 1999-43 on 10/25/99.
- 4. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-42 in IRB 1999-41 on 10/12/99.

<u>November</u>

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-45 in IRB 1999-45 on 11/8/99.
- Revenue Ruling providing the "base period T-Bill rate" as required by section 995(f)(4).
 ! Completed. See Rev Rul 99-52 in IRB 1999-50 on 12/13/99.
- 3. Revenue Ruling setting forth covered compensation tables for the 2000 calendar year for determining contributions to defined benefit plans and permitted disparity. ! Completed. See Rev Rul 99-47 in IRB 1999-48 on 11/29/99.
- 4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in November 1999.
 ! Completed. See NT 99-54 in IRB 1999-47 on 11/22/99.
- 5. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-46 in IRB 1999-45 on 11/8/99.

December

- 1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520. ! Completed. See Rev Rul 99-48 in IRB 1999-49 on 12/6/99.
- Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period October through December, 1999.
 Completed. See Rev Rul 99-54 in IRB 1999-51 on 12/20/99.
- Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period January through March, 2000.
 Completed. See Rev Rul 99-53 in IRB 1999-50 on 12/13/99.
- Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in December 1999.
 ! Completed. See NT 99-61 in IRB 1999-52 on 12/27/99.

- 5. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories. ! Completed. See Rev Rul 99-55 in IRB 1999-51 on 12/20/99.
- Revenue Procedure under section 1 and other sections of the Code regarding the inflation adjusted items for 2000.
 Completed. See Rev Proc 99-42 in IRB 1999-46 on 11/15/99.
- Revenue Procedure under section 62 regarding the deduction and deemed substantiation of federal travel per diem amounts.
 ! Completed. See Rev Proc 2000-9 in IRB 2000-2 on 1/10/00.
- Revenue Procedure under section 6662 regarding what information shown on a return is an adequate disclosure.
 ! Completed. See Rev Proc 99-41 in IRB 1999-46 on 11/15/99.
- 9. Revenue Procedure setting forth, pursuant to section 1397E of the Code, the maximum face amount of Qualified Zone Academy Bonds that may be issued for each state during 2000.

! Completed. See Rev Proc 2000-10 in IRB 2000-2 on1/10/00.