

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

Number: **200519050**

Release Date: 5/13/2005

CC:TEGE:EOEG:ET1  
POSTN-161040-04

UILC: 3231.01-00

date: January 04, 2005

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

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

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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 is not an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act:

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

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Janine Cook