

Part III – Administrative, Procedural, and Miscellaneous

Public Comment Invited on Recommendations for 2004-2005 Guidance Priority List

Notice 2004-26

The Department of Treasury and Internal Revenue Service invite public comment on recommendations for items that should be included on the 2004-2005 Guidance Priority List.

Treasury's Office of Tax Policy and the Service use the Guidance Priority List each year to identify and prioritize the tax issues that should be addressed through regulations, revenue rulings, revenue procedures, notices, and other published administrative guidance. The 2004-2005 Guidance Priority List establishes the guidance that the Treasury Department and the Service intend to issue from July 1, 2004, through June 30, 2005. The Treasury Department and the Service recognize the importance of public input to formulate a Guidance Priority List that focuses resources on guidance items that are most important to taxpayers and tax administration.

In reviewing recommendations and selecting projects for inclusion on the 2004-2005 Guidance Priority List, the Treasury Department and the Service will consider the following:

1. Whether the recommended guidance is consistent with the Internal Revenue Code and Congressional intent;
2. Whether the recommended guidance promotes sound tax administration;
3. Whether taxpayers can easily understand and apply the recommended guidance;
4. Whether the Service can administer the recommended guidance on a uniform basis;
and
5. Whether the recommended guidance reduces controversy and lessens the burden on taxpayers or the Service.

Taxpayers may submit recommendations for guidance at any time during the year. Please submit recommendations by April 30, 2004, for possible inclusion on the original 2004-2005 Guidance Priority List. The Service will update the 2004-2005 Guidance Priority List quarterly to reflect additional guidance that the Treasury Department and the Service intend to publish during the plan year. The quarterly updates allow the Treasury Department and the Service to respond to the need for additional guidance that may arise during the plan year. Generally, recommendations for guidance received after April 30, 2004, will be reviewed for inclusion in the next quarterly update if received by August 31, 2004; November 30, 2004; or February 28, 2005, respectively.

Taxpayers are not required to submit recommendations for guidance in a particular format. Taxpayers should, however, briefly describe the recommended guidance and explain the need for the guidance. In addition, taxpayers may include an analysis of how the issue should be resolved.

Taxpayers should send written comments to:

Internal Revenue Service
Attn: CC:PA:LPD:PR (Notice 2004-26)
Room 5203
P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20044

or hand deliver comments between the hours of 8 a.m. and 5 p.m. to:

Courier's Desk
Internal Revenue Service
Attn: CC:PA:LPD:PR (Notice 2004-26)
1111 Constitution Avenue, N.W.
Washington, D.C. 20224

Alternatively, taxpayers may submit comments electronically via e-mail to the following address: Notice.Comments@irs.counsel.treas.gov. Taxpayers should include "Notice 2004-26" in the subject line. All comments will be available for public inspection and copying in their entirety.

For further information regarding this notice, contact Crystal Foster of the Office of Associate Chief Counsel (Procedure and Administration) at (202) 622-7326 (not a toll-free call).