### OFFICE OF TAX POLICY

### AND

## INTERNAL REVENUE SERVICE

### 2002 - 2003 PRIORITY GUIDANCE PLAN LIST

### DECEMBER 31, 2002 UPDATE

#### CONSOLIDATED RETURNS

#### Original PGP Projects Published:

- 1. Final regulations containing conforming amendments to section 446 regulations to reflect changes in the consolidated return regulations.
  - PUBLISHED 12/16/2002 in FR as TD 9025.
- 3. Guidance under section 1502 and 337(d) regarding losses on member stock.
  - PUBLISHED 10/23/2002 in FR as REG-131478-02

### CORPORATIONS AND THEIR SHAREHOLDERS

- 1. Guidance regarding redemptions of corporate stock.
  - PUBLISHED 10/18/2002 in FR as NPRM REG-150313-01
- 7. Guidance regarding the active trade or business requirement under section 355(b).
  - WILL PUBLISH 2/18/2003 in IRB 2003-7 as REV. RUL. 2003-18 (released 1/22/2003)
- 10. Guidance regarding mergers with disregarded entities.
  - WILL PUBLISH 1/24/2003 in FR as TD 9038
- 12. Guidance under section 368 regarding reorganizations involving non-stock entities.
  - WILL PUBLISH 2/18/2003 in IRB 2003-7 as REV. RUL. 2003-19 (released 1/22/3002)
- 14. Guidance regarding the application of section 368(a)(1)(D) when assets are transferred by the transferee to a subsidiary.

• PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-85

## **EMPLOYEE BENEFITS**

### A. Retirement Benefits

Original PGP Projects Published:

- 1. Guidance under section 72(t) regarding substantially equal periodic payments.
  - PUBLISHED 10/21/2002 in IRB 2002-42 as REV. RUL. 2002-62
- 2. Final regulations relating to plan loans under section 72(p).
  - PUBLISHED 12/3/2002 in FR as TD 9021
- 4. Guidance under section 401(a)(17) regarding whether the increase in the allowable compensation limit enacted by EGTRRA may be applied to former employees.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-11 (released 12/20/2002)
- 9. Guidance under section 408(d) regarding how to request the discretionary 60 day rollover period related to disasters.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-16 (released 1/8/2003)
- 10. Guidance under section 408(q).
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-13. (released 1/2/2003)
- 11. Guidance relating to cash balance pension plans.
  - PUBLISHED 12/11/2002 in FR as NPRM REG 209500-86
  - PUBLISHED 1/13/2003 in IRB 2003-2 as ANNOUNCEMENT 2003-1 (released 12/10/2002)
- 12. Guidance relating to the application of section 411(d)(6).
  - WILL PUBLISH 2/3/2003 in IRB 2003-5 as NOTICE 2003-10 (released 1/10/2003)
- 17. Guidance on disclosure to participants regarding their distributions from pension plans.
  - PUBLISHED 10/7/2002 in FR as NPRM REG-124667-02

### Additional Projects:

24. Revenue ruling modifying Rev. Rul. 2002-46 regarding grace period contributions to a section 401(k) plan and matching contributions to a qualified defined contribution plan.

- PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-73
- 25. Revenue ruling on recovery of plan overpayment.
  - PUBLISHED 12/16/2002 in IRB 2002-50 as REV. RUL. 2002-84 (released 11/27/2002)
- 26. Revenue ruling under section 411 on taking frozen accruals into account.
- 27. Revenue procedure on statute of limitations under section 4971.
- 28. Revenue ruling on the effect of EGTRRA on the elimination of optional forms of benefit in defined contribution plans.
- 29. Proposed regulations on the application of section 401(a)(4) for cash balance plans.
  - PUBLISHED 12/11/2002 in FR as NPRM REG-164464-02
- 30. Notice on section 401(a)(9) effective date.
  - PUBLISHED 1/13/2003 in IRB 2003-2 as NOTICE 2003-2 (released 12/20/2002)
- 31. Notice extending delay of nondiscrimination rules for certain governmental plans.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as NOTICE 2003-6 (released 12/20/2002)
- 32. Notice regarding section 401(a)(9) reporting.
  - PUBLISHED 1/13/2003 in IRB 2003-2 as NOTICE 2003-3 (released 12/20/2002)
- 33. Revenue procedure regarding extension of GUST amendment period.
  - PUBLISHED 12/9/2002 in IRB 2002-49 as REV. PROC. 2002-73
- 34. Revenue procedure regarding delayed effective date of section 401(a)(9).
  PUBLISHED 1/13/2003 in IRB 2003-2 as REV. PROC. 2003-10
- 35. Revenue ruling regarding effective date of S Corp/ESOP.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-6 (released 12/17/2002)
- 36. Guidance regarding length-of-service award program under section 457(e)(11)(B).
- B. Executive Compensation, Health Care and Other Benefits, and Employment Taxes

- 4. Guidance on whether accident and health plan reimbursements for medical expenses incurred before the inception of the plan are excludable from the recipient's gross income under section 105(b).
  - PUBLISHED 9/23/2002 in IRB 2002-38 as REV. RUL. 2002-58
- 5. Guidance under section 105(b) on self-insured medical flexible spending arrangements that pay the full amount of the maximum benefit at the beginning of the plan year.
  - PUBLISHED 12/9/2002 in IRB 2002-49 as REV. RUL. 2002-80

- 18. Notice regarding effective date of Rev. Proc. 2002-41.
  - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-55
- 19. Revenue ruling under section 83 regarding payment for property with a note.
- 20. Notice regarding leave donation programs.
  PUBLISHED 1/13/2003 in IRB 2003-2 as NOTICE 2003-1
- 21. Guidance under section 419A(f)(5) on the definition of collectively bargained agreement.
- 22. Notice on issues with respect to the tax treatment of choreworkers.
- 23. Withdrawal of proposed regulations under section 3321 regarding imposition of Railroad Unemployment Repayment Tax.
  - PUBLISHED 11/7/2002 in FR as REG-209116-89
- 24. Revenue ruling on application of section 4980 to transfer of excess assets.
- 25. Revenue ruling on application of section 4980B in divorce situations.
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-88
- 26. Announcement regarding Form W-2, Code V.
  - PUBLISHED 12/9/2002 in IRB 2002-49 as ANNOUNCEMENT 2002-108
- 27. Revenue ruling under section 4980B on COBRA small employer plan exception.

### EXCISE TAXES

- 1. Guidance under sections 4041 and 4081 regarding biodiesel.
  - PUBLISHED 11/18/2002 in IRB 2002-46 as REV. RUL. 2002-76

- 5. Guidance under section 4221 regarding fuel used in foreign trade.
  - PUBLISHED 8/12/2002 in IRB 2002-32 as REV. RUL. 2002-50
- 6. Guidance under section 4261(e)(3) regarding the purchase of the right to provide mileage awards.
  - PUBLISHED 10/7/2002 in IRB 2002-40 as NOTICE 2002-63

- 8. Revenue ruling under section 4261 regarding the sales of frequent flyer miles.
  - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. RUL. 2002-60

# EXEMPT ORGANIZATIONS

Original PGP Projects Published:

- 3. Guidance under section 501(c)(12).
  - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-55
  - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-54
- 4. Guidance on private foundation terminations.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-13 (released 1/7/2003)

- 8. Form 990 series developments and request for comments regarding proposed changes.
  - PUBLISHED 9/30/2002 in IRB 2002-39 as ANNOUNCEMENT 2002-87
- 9. Request for comments regarding application for recognition of exemption.
  PUBLISHED 10/15/2002 in IRB 2002-41 as ANNOUNCEMENT 2002-92
- 10. Revenue procedure on annual filing requirements for organizations formed in U.S. possessions.
- 11. Revenue procedure regarding exclusion from income under section 115.
  WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-12
- 12. Revenue ruling on unrelated business income tax issues relating to retail sales.

# FINANCIAL INSTITUTIONS AND PRODUCTS

### Additional Projects:

- 12. Notice clarifying Notice 2001-10 and Notice 2002-8.
  - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-59
- 13. Revenue ruling regarding the effect of collars on qualified covered calls status.
  - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-66
- 14. Revenue ruling regarding hedges of debt instruments under section 1.446-4(e)(4).
  - PUBLISHED 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-71
- 15. Revenue ruling regarding section 1259 re-established positions.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-1
- 16. Revenue ruling regarding treatment of forward contract with significant variation.
  - WILL PUBLISH 2/3/2003 in IRB 2003-5 as REV. RUL. 2003-7\
- 17. Revenue procedure concerning the treatment of a regulated investment company that holds a partnership interest.
- 18. Revenue ruling concerning the effect of section 1001(d)(2) to changes made to margin accounts.
- 19. Revenue ruling concerning the timing rules of hedging transactions not identified under regulation section 1.1221-2(f).

### GENERAL TAX ISSUES

- 3. Final regulations under section 25A regarding the Hope Scholarship and Lifetime Learning credits.
  - PUBLISHED 12/26/2002 in FR as TD 9034
- 9. Guidance under section 42 regarding the Rent Supplemental Payment Program/Rental Assistance Payment Program.
  - PUBLISHED 10/28/2002 in IRB 2002-43 as REV. RUL. 2002-65
- 11. Guidance under section 45D regarding the new markets tax credit.
  - WILL PUBLISH 2/3/2003 in IRB 2003-5 as NOTICE 2003-9 (released 1/8/2003)

- 13. Guidance under section 61 regarding trusts for minors.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-14
- 14. Final regulations under section 121 regarding the exclusion of gain on the sale of a principal residence.
  - PUBLISHED 12/24/2002 in FR as TD 9030
  - PUBLISHED 12/24/2002 in FR as TEMP 9031
- 15. Guidance under section 126 regarding the Soil and Water Conservation Program.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-14
- 16. Guidance under section 126 regarding the Agricultural Management Assistance Program.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-15
- 19. Guidance under sections 162 and 274 regarding the deduction for travel expenses while away from home.
  - PUBLISHED 11/12/2002 in FR as TEMP 9020
- 27. Guidance under section 170 regarding the deduction for vehicles donated to charities.
  - PUBLISHED 11/25/2002 in IRB 2002-47 as REV. RUL. 2002-67
- 31. Final regulations under section 469 regarding self-charged interest.
  - PUBLISHED 8/21/2002 in FR as TD 9013
- 33. Regulation under section 1041 regarding when transfers of property to third parties are made "on behalf of" the nontransferring spouse.
  - PUBLISHED 1/13/2003 in FR as TD 9035

- 35. Notice under section 45D regarding other federal tax benefits.
  - PUBLISHED 10/15/2002 in IRB 2002-41 as NOTICE 2002-64
- 36. Notice under section 121 regarding the reduced maximum exclusion of gain on the sale of a principal residence for taxpayers affected by the September 11, 2001, terrorist attacks.
  - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-60
- 37. Revenue ruling on deductions under sections 162 and 163 in connection with lease-in, lease-out (LILO) transactions.
  - PUBLISHED 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-69
- 38. Notice on the tax treatment of payments made under USDA Peanut Quota Buyout Program.
  - PUBLISHED 10/21/2002 in IRB. 2002-42 as NOTICE 2002-67

- 39. Revenue ruling under section 1241 on cancellation of lease or distributor agreements.
- 40. Revenue procedure regarding the election under section 1397B.
  - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. PROC. 2002-62
- 41. Revenue ruling under sections 61, 102, and 139 regarding payments to victims of disasters.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-12 (released 12/19/2002)
- 42. Notice under sections 61 and 139 regarding payments to residents of lower Manhattan affected by the September 11, 2001, terrorist attacks.
  - PUBLISHED 12/2/2002 in IRB 2002-48 as NOTICE 2002-76
- 43. Revenue ruling under section 1031 regarding the use of related parties as intermediaries in a purported like kind exchange.
  - PUBLISHED 12/9/2002 in IRB 2002-49 as REV. RUL. 2002-83
- 44. Revenue ruling under section 168 regarding the depreciation of general assets owned by a utility.
- 45. Revenue procedure under section 1400l regarding the commercial revitalization deduction.
- 46. Guidance regarding advance rentals.
  - PUBLISHED 12/18/2002 in FR as NPRM REG-151043-02
- 47. Notice regarding payments to businesses located in lower Manhattan affected by the September 11, 2001, terrorist attacks.
- 48. Guidance under section 274 regarding the use of statistical sampling.
- 49. Revenue ruling under section 45D regarding leveraged partnerships.
  - WILL PUBLISH 2/18/2003 in IRB 2003-7 as REV. RUL. 2003-20 (released 1/23/2003)

### GIFTS, ESTATES AND TRUSTS

- 2. Final regulations under section 645 regarding an election by certain revocable trusts to be treated as part of the associated estate.
  - PUBLISHED 12/24/2002 in FR as TD 9032
- 8. Guidance under sections 2033 and 2039 regarding New York City and New York State Accidental Death Benefits.

• PUBLISHED 7/8/2002 in IRB 2002-27 as REV. RUL. 2002-29

#### Additional Projects:

- 13. Revenue ruling under section 2201, as amended by the Victims of Terrorism Relief Act of 2001, providing sample computations of the estate tax.
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-86
- 14. Revenue ruling under section 2042 regarding the taxation of life insurance of Louisiana decedents.

# **INSURANCE COMPANIES AND PRODUCTS**

### Original PGP Projects Published:

- 1. Guidance on the treatment of certain captive insurance companies.
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-89
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-90
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-91
  - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. PROC. 2002-75

### Additional Projects:

- 5. Revenue ruling regarding the aggregation of annuity contracts.
  - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL, 2002-75
- 6. Revenue ruling regarding viatical settlement company licensing requirement.
  - PUBLISHED 12/23/2002 in IRB 2002-51 as REV. RUL. 2002-82
- 7. Revenue procedure regarding composite method for loss reserve discounting.
  - PUBLISHED 12/23/2002 in IRB 2002-51 as REV. PROC. 2002-74
- 8. Notice regarding treatment of certain re-insurance transactions
  - PUBLISHED 11/4/2002 in IRB 2002-44 as NOTICE 2002-70

### INTERNATIONAL ISSUES

### **B.** Inbound Transactions

- 2. Guidance under section 1441.
  - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. PROC. 2002-55
  - PUBLISHED10/21/2002 in IRB 2002-42 as NOTICE 2002-66
- 4. Final regulations relating to ITINs on expedited basis.

• PUBLISHED 11/22/2002 in FR as TD 9023

## C. Outbound Transactions

### Original PGP Projects Published:

- 1. Guidance on international restructurings.
  - PUBLISHED 11/19/2002 in FR as NPRM REG-127380-02
  - PUBLISHED 12/30/2002 in IRB 2002-52 as NOTICE 2002-77

### D. Foreign Tax Credits

### Original PGP Project Published:

- 3. Guidance on 10/50 company look-through.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as NOTICE 2003-5 (released 12/23/2002)

### G. Other

### Original PGP Projects Published:

- 1. Guidance on the taxation of foreign insurance companies.
  - PUBLISHED 10/28/2002 in IRB 2002-43 as NOTICE 2002-69
  - PUBLISHED 11/27/2002 in FR as TD 9024
  - WILL PUBLISH 2/10/2003 in IRB 2003-6 as REV. RUL. 2003-17

### Additional Projects:

- 5. Proposed regulations regarding partner filing requirements for controlled foreign partnerships under section 6038
  - PUBLISHED 12/23/2002 in FR as NPRM REG-124069-02 and TD 9033.
- 6. Revenue ruling addressing the creditability of a Costa Rican soak-up tax.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-8 (released 12/31/2002)

### PARTNERSHIPS

- 5. Guidance on synthetic tax-exempt bonds.
  PUBLISHED 10/28/2002 in IRB 2002-43 as REV. PROC. 2002-68
- 6. Guidance regarding partnerships options and convertible instruments.
  - PUBLISHED 1/22/2003 in FR as NPRM REG-103580-02
- 10. Guidance regarding entity classification and community property owners.

- PUBLISHED 11/12/2002 in IRB 2002-45 as REV. PROC. 2002-69
- 11. Guidance under section 7701 regarding late check-the-box elections.
  - PUBLISHED 9/30/2002 in IRB 2002-39 as REV. PROC. 2002-59

### SUBCHAPTER S

### Additional Project:

5. Revenue ruling under section 1361 regarding QSUB elections.

# TAX ACCOUNTING

- 1. Guidance regarding the treatment of costs incurred for railroad track maintenance.
  - PUBLISHED 10/15/2002 in IRB 2002-41 as REV. PROC. 2002-65
- 3. Proposed regulations under sections 162 and 263 regarding deduction and capitalization of expenditures.
  - PUBLISHED 12/19/02 in FR as NPRM REG-125638-01
- 6. Revenue procedure under section 442 regarding automatic annual accounting period change procedures for individuals.
  - PUBLISHED 11/25/1002 in IRB 2002-47 as NOTICE 2002-75
- 7. Revenue procedure under section 446 to clarify procedures applicable to voluntary changes in methods of accounting.
  - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. PROC. 2002-54
- 8. Proposed regulations under section 448 regarding the nonaccrual experience method.
  - WILL PUBLISH 2/10/2003 in IRB 2003-6 as NOTICE 2003-12 (released 1/22/2003)
- 9. Guidance under section 451 regarding the treatment of advance payments.
  - PUBLISHED 12/16/2002 in IRB 2002-50 as NOTICE 2002-79
- 10. Guidance under section 451 regarding the accrual of tax refunds.
  - PUBLISHED 1/13/2003 in IRB 2003-2 as REV. RUL. 2003-3
- 11. Guidance under section 451 regarding the accrual of amounts in dispute by vendors and retailers.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-10
- 14. Final regulations under section 471 regarding the unit livestock price method of accounting.

- PUBLISHED 10/28/2002 in FR as TD 9019
- 15. Guidance under section 471 regarding the valuation of core inventory under the lower of cost or market method.
  - WILL PUBLISH 2/10/2003 in IRB 2003-6 as REV. PROC. 2003-20 (released 1/22/2003)

- 17. Guidance amplifying and clarifying revenue procedures under section 442 regarding changes in annual accounting period.
  - PUBLISHED 11/18/2002 in IRB 2002-46 as NOTICE 2002-72
- 18. Guidance under section 263A(f) regarding safe harbor leasing transactions.
- 19. Update of Rev. Proc. 77-12 regarding valuation of inventories.
- 20. Revenue procedure under section 442 regarding net operating losses and capital losses arising in a short period resulting from a change in annual accounting period.
- 21. Guidance under section 461 regarding the proper year for deduction of payroll taxes on deferred compensation by accrual method taxpayers.
- 22. Guidance on the tax treatment of rotable spare parts.
- 23. Guidance on the tax treatment of fuel cost overrecoveries.

### TAX ADMINISTRATION

- 8. Guidance under section 6011 regarding the disclosure of certain large transactions.
  - PUBLISHED 10/22/2002 in FR as TD 9017
- 10. Guidance under section 6111 regarding corporate tax shelter registration.
  PUBLISHED 10/22/2002 in FR as TD 9017
- 11. Guidance under section 6112 regarding list of tax shelter investors.
  - PUBLISHED 10/22/2002 in FR as TD 9018
- 13. Revenue procedure allowing a nonrequesting spouse to file a protest with Appeals regarding an innocent spouse claim under section 6015
  - WILL PUBLISH 2/3/2003 in IRB 2003-5 as REV. PROC. 2003-19
- 15. Proposed regulations under section 6045 regarding information reporting relating to taxable stock transactions.

- PUBLISHED 11/18/2002 in FR as NPRM REG-143321-02
- 16. Final regulations under 6050S regarding information reporting for qualified tuition and related expenses.
  - PUBLISHED 12/19/2002 in FR as TD 9029
- 30. Final regulations regarding offers-in-compromise.
  - PUBLISHED 7/23/2002 in FR as TD 9007
- 31. Proposed regulations imposing a user fee for offers-in-compromise.
  - PUBLISHED 11/6/2002 in FR as NPRM REG-103777-02
- 37. Final regulations under section 7602(c) regarding third party contacts.
  - PUBLISHED 12/18/2002 in FR as TD 9028
- 39. Final regulations excluding certain low-income taxpayer clinics from the definition of income tax return preparers.
  - PUBLISHED 12/18/2002 in FR as TD 9026
- 40. Revisions to Circular 230 regarding practice before the IRS.
  - PUBLISHED 12/19/2002 in FR as ANPRM REG-122380-02
- 43. Guidance under section 301.9100-1 on the extension of time to make elections.
  - PUBLISHED 9/3/2002 in IRB 2002-35 as NOTICE 2002-58
- 44. Update Statement of Procedural Regulations regarding the Freedom of Information Act.
  - PUBLISHED 11/19/2002 in FR as SPR REG-251003-96

- 45. Guidance under section 1363 regarding the effect of a n S corporation election.
  - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-4
- 46. Proposed regulations under various provisions regarding adjustments under section 481(a) for changes in accounting method.
- 47. Guidance regarding tax shelter transactions involving a straddle, a tiered partnership, a transitory partner, and the absence of a section 754 election.
  - PUBLISHED 7/15/2002 in IRB 2002-28 as NOTICE 2002-50
- 48. Guidance regarding tax shelter transactions involving S corporation/ partnership straddles.
  - PUBLISHED 10/15/2002 in IRB 2002-41 as NOTICE 2002-65

- 49. Revenue procedure prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving Notice 2001-17 contingent liability transactions.
  - PUBLISHED 10/28/2002 in IRB 2002-43 as REV. PROC. 2002-67
- 50. Announcement prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving Notice 2001-45 basis shifting transactions.
  - PUBLISHED 10/28/2002 in IRB 2002-43 as ANNOUNCEMENT 2002-97
- 51. Announcement prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving corporate-owned life insurance (COLI) transactions.
  - PUBLISHED 10/28/2002 in IRB 2002-43 as ANNOUNCEMENT 2002-96
- 52. Revenue procedure regarding the reporting requirements under section 6050I for taxi cab drivers and fleet owners relating to lease payments aggregating in excess of \$10,000.
- 53. Regulations under section 6109 allowing income tax return preparers to elect an alternative to their social security number for purposes of identifying themselves on returns that they prepare.
  - PUBLISHED 8/14/2002 in FR as TD 9014
- 54. Regulations under section 7602 regarding the designation of IRS officers or employees to take summoned testimony or receive summoned information.
  - PUBLISHED 9/10/2002 in FR as TD 9015
- 55. Notice regarding the reporting requirements under section 6045 relating to sales of securities futures contracts through brokers.
  - WILL PUBLISH 1/27/2003 in IRB 2003-4 as NOTICE 2003-8 (released 1/10/2003)
- 56. Final regulations under section 6103 allowing disclosures to the Bureau of the Census for statistical purposes and other related activities.
  - PUBLISHED 1/22/2003 in FR as TD 9037
- 57. Final regulations under section 6103 regarding triangular disclosure of tax return information.
  - PUBLISHED 1/22/2003 in FR as TD 9036
- 58. Final regulations applying section 6331(k) to installment agreements.
  - PUBLISHED 12/18/2002 in FR as TD 9027
- 59. Revenue procedure describing a voluntary compliance initiative for taxpayers that have avoided taxation through the use of offshore payment cards or other offshore financial arrangements.

- WILL PUBLISH 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-11 (released 1/14/2003)
- 60. Proposed regulations under sections 6662 and 6664 regarding penalties relating to tax shelters.
  - PUBLISHED 12/31/2002 in FR as NPRM REG-126016-01
- 61. Notice regarding the effective date of tax shelter registrations.
  - WILL PUBLISH 2/10/2003 in IRB 2003-6 as NOTICE 2003-11 (released 1/17/2003)
- 62. Final regulations regarding electronic filing of attachments to Form 1040.
- 63. Final regulations under section 6103 regarding disclosures to contractors.
- 64. Announcement allowing domestic corporations and brokers to use a form letter in lieu of Form 1099-CAP.
  - WILL PUBLISH 2/10/2003 in IRB 2003-6 as ANNOUNCEMENT 2003-7 (released 1/22/2003)

# TAX EXEMPT BONDS

Original PGP Projects Published:

- 3. Final regulations under section 141 regarding output facilities.
  - PUBLISHED 9/23/2002 in FR as TD 9016
- 4. Notice under section 141 regarding allocation and accounting rules for output facilities.
  - PUBLISHED 9/23/2002 in FR as ANPRM REG-142599-02
- 8. Guidance on procedures for requesting an extension of time to file information returns required by section 149(e).
  - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. PROC. 2002-48 (released 8/30/2002)

- 11. Qualified public educational facility bonds 2002 calendar year resident population.
  - PUBLISHED 8/12/2002 in IRB 2002-32 as NOTICE 2002-56
- 12. Guidance under section 146.
- 13. Liberty Zone advance refunding notice.
  - PUBLISHED 11/18/2002 in IRB 2002-46 as NOTICE 2002-73 (released 10/31/2002)