

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

FEB 18 1999

CHIEF COUNSEL COR-122597-98 UILC: 3231.01-00

> Number: **199921011** Release Date: 5/28/1999

MEMORANDUM FOR

FROM: Chief, Branch 6, Office of the Associate Chief Counsel

(Employee Benefits and Exempt Organizations)

SUBJECT: CC:EBEO:6 -

Railroad Retirement Act Tax Status

Attached for your information and appropriate action is a copy of a letter from the Railroad Retirement Board concerning the status under the Railroad Retirement Act and the Railroad Unemployment Insurance Act of:

We have reviewed the opinion of the Railroad Retirement Board and, based solely upon the information submitted, concur in the conclusion that became an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective

HARRY BEKER	