Department of the Treasury **Internal Revenue Service** Washington, DC 20224 Index Number: 368.04-00 Person to Contact: Number: 199935004 Release Date: 9/3/1999 Telephone Number: Refer Reply To: CC:DOM:CORP:4 PLR-109493-99 March 26, 1999 Dear This letter is in reference to our letter dated November 12, 1997 in which a ruling was issued regarding a proposed internal reorganization of It has since been discovered that ruling (49) step (iv) should have read as follows: P had contributed the JF1 stock to Newco in exchange for voting common stock and nonvoting preferred stock of Newco (Rev. Rul. 77-191). Thank you for your cooperation in this matter. Sincerely,

By:

Branch 4

Wayne T. Murray

Senior Technician/Reviewer

Assistant Chief Counsel (Corporate)