

OFFICE OF TAX POLICY
AND
INTERNAL REVENUE SERVICE
2002 - 2003 PRIORITY GUIDANCE PLAN LIST
March 31, 2003 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 NPRM REG-131478-02
 - PUBLISHED 3/14/2003 in FR as TD 9048

CORPORATIONS AND THEIR SHAREHOLDERS

Original PGP Projects Published:

1. Guidance regarding redemptions of corporate stock.
 - PUBLISHED 10/18/2002 in FR as NPRM REG-150313-01
2. Final regulations regarding conversions of C corporations to RIC or REIT status.
 - PUBLISHED 3/18/2003 in FR as TD 9047
7. Guidance regarding the active trade or business requirement under section 355(b).
 - PUBLISHED 2/18/2003 in IRB 2003-7 as REV. RUL. 2003-18 (released 1/22/2003)
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-38 (released 4/4/2003)
10. Guidance regarding mergers with disregarded entities.
 - PUBLISHED 1/24/2003 in FR as TD 9038
12. Guidance under section 368 regarding reorganizations involving non-stock entities.
 - PUBLISHED 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

Additional Project:

19. Revenue procedure regarding section 301.9100-3 relief for section 338 elections.
 - WILL PUBLISH 4/21/2003 in IRB 2003-16 as REV. PROC. 2003-33 (released 4/2/2003)

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 (released 10/3/2002)
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.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as REV. PROC. 2003-16 (released 1/8/2003)
10. Guidance under section 408(q).
 - PUBLISHED 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).
 - PUBLISHED 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
22. Final regulations relating to section 4980F on notice of significant reduction in the rate of future benefit accrual.
 - PUBLISHED 4/9/2003 in FR as TD 9052

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
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as ANNOUNCEMENT 2003-22 (released 4/7/2003)
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 (released 11/19/2002)
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 (released 12/20/2002)
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).
37. Guidance on prohibited allocations of securities in an S corporation.
38. Proposed regulations under section 408(q) deemed IRAs.

B. Executive Compensation, Health Care and Other Benefits, and Employment Taxes

Original PGP Projects Published:

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

Additional Projects:

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.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-24 (released 4/11/2003)
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 (released 11/22/2002)
27. Revenue ruling under section 4980B on COBRA small employer plan exception.
28. Notice on certain offshore deferred compensation arrangements involving domestic and foreign employee leasing companies.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-22 (released 4/4/2003)
29. Revenue ruling on distributions from a qualified retirement plan used to pay health insurance under a former employer's cafeteria plan.

EXCISE TAXES

Original PGP Projects Published:

1. Guidance under sections 4041 and 4081 regarding biodiesel.
 - PUBLISHED 11/18/2002 in IRB 2002-46 as REV. RUL. 2002-76
4. Final regulations under section 4081 relating to the revision of the definition of diesel fuel.
 - PUBLISHED 4/2/2003 in FR as TD 9051
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

Additional Projects:

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
9. Proposed regulations under section 4252 regarding toll telephone services.
 - PUBLISHED 4/1/2003 in FR as NPRM REG-141097-02

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 (released 8/30/2002)
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-54 (released 8/30/2002)
4. Guidance on private foundation terminations.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-13 (released 1/7/2003)

Additional Projects:

8. Form 990 series developments and request for comments regarding proposed changes.
 - PUBLISHED 9/30/2002 in IRB 2002-39 as ANNOUNCEMENT 2002-87 (released 9/5/2002)
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.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as REV. PROC. 2003-21 (released 1/23/2003)
11. Revenue procedure regarding exclusion from income under section 115.
 - PUBLISHED 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.

13. Revenue ruling on education grants awarded by a private foundation to employees or children of employees of a particular employer who are victims of a qualified disaster.
 - PUBLISHED 4/7/2003 in IRB 2003-14 as REV. RUL. 2003-32 (released 3/26/2003)
14. Revenue ruling providing questions and answers on the reporting and disclosure requirements for political organizations described in section 527.
15. Revenue ruling on application of section 45B to social clubs.

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.
 - PUBLISHED 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.
 - WILL PUBLISH 4/21/2003 in IRB 2003-16 as REV. PROC. 2003-32
18. Revenue ruling concerning the effect of section 1001(d)(2) to changes made to margin accounts.
 - PUBLISHED 3/13/2003 in IRB 2003-13 as REV. RUL. 2003-31
19. Revenue ruling concerning the timing rules of hedging transactions not identified under regulation section 1.1221-2(f).
20. Guidance regarding the characterization of income for REIT qualification purposes.

GENERAL TAX ISSUES

Original PGP Projects Published:

2. Guidance under section 23 regarding the credit for adoption expenses.
 - PUBLISHED 3/3/2003 in IRB 2003-9 as NOTICE 2003-15.
3. Final regulations under section 25A regarding the Hope Scholarship and Lifetime Learning credits.
 - PUBLISHED 12/26/2002 in FR as TD 9034
5. Other guidance under section 32.
 - PUBLISHED 3/6/2003 in FR as TD 9045
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.
 - PUBLISHED 2/3/2003 in IRB 2003-5 as NOTICE 2003-9 (released 1/8/2003)
13. Guidance under section 61 regarding trusts for minors.
 - PUBLISHED 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.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-14
16. Guidance under section 126 regarding the Agricultural Management Assistance Program.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-15
18. Guidance under section 162 regarding substantiation of the amount of expenses for meals furnished by child care providers.
 - PUBLISHED 3/10/2003 in IRB 2003-10 as REV. PROC 2003-22.
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

Additional Projects:

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 (LILLO) 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.
 - PUBLISHED 4/7/2003 in IRB 2003-14 as NOTICE 2003-18.
48. Guidance under section 274 regarding the use of statistical sampling.
49. Revenue ruling under section 45D regarding leveraged partnerships.
 - PUBLISHED 2/18/2003 in IRB 2003-7 as REV. RUL. 2003-20 (released 1/23/2003)
50. Revenue ruling under sections 121 and 1031 regarding like-kind exchange of a principal residence.
51. Revenue ruling under section 170 regarding the deduction for charitable contributions of patents.
 - PUBLISHED 3/17/03 in IRB 2003-11 as REV. RUL. 2003-28.
52. Guidance under section 172 regarding specified liability losses.
53. Revenue ruling under section 213 regarding the deduction for medical expenses.
54. Final regulations under section 274 regarding substantiation of incidental expenses.
55. Revenue ruling under section 42(d)(4)(C) regarding community service facilities.
56. Notice on the application of the EITC for taxpayers caring for children placed with them by an Indian tribe or an Indian tribal organization.

GIFTS, ESTATES AND TRUSTS

Original PGP Projects Published:

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.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-40

15. Revenue ruling under section 2057 regarding recapture.

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
9. Revenue ruling regarding special estimated tax payments under section 847.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-34

INTERNATIONAL ISSUES

A. Subpart F/Deferral

Original PGP Projects Published:

3. Final regulations relating to commodities hedging/foreign currency gain or loss under section 954.
 - PUBLISHED 1/31/2003 in FR as TD 9039

B. Inbound Transactions

Original PGP Projects Published:

1. Final regulations under sections 874(a) and 882(c).
 - PUBLISHED 3/10/2003 in FR as TD 9043
2. Guidance under section 1441.
 - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. PROC. 2002-55
 - PUBLISHED 10/21/2002 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 Project 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
 - PUBLISHED 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)
7. Annual report on Advance Pricing Agreement Program.
 - PUBLISHED 4/14/2003 in IRB 2003-15 as ANNOUNCEMENT 2003-19
8. Announcement of agreement relating to certain investments by Dutch pension funds.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as ANNOUNCEMENT 2003-21
9. Notice on reporting under section 6048 with respect to certain Canadian retirement arrangements.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-25 (released 4/11/2003)

PARTNERSHIPS

Original PGP Projects Published:

4. Final regulations under section 705 regarding the determination of basis of partner's interest.
 - PUBLISHED 3/18/2003 in FR as TD 9049
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

Additional Project:

12. Revenue ruling under sections 752 and 1031 regarding partnership like-kind exchanges.

SUBCHAPTER S

Original PGP Projects Published:

2. Guidance under section 1362 regarding ESOP rollover to IRA.
 - PUBLISHED 3/17/2003 in IRB 2003-11 as REV. PROC. 2003-23 (released 2/20/2003)
4. Guidance under section 1367 regarding the basis of S corporation stock held by ESOP.
 - PUBLISHED 3/17/2003 in IRB 2003-11 as REV. RUL. 2003-27 (released 2/20/2003)

Additional Project:

5. Revenue ruling under section 1361 regarding QSUB elections.

TAX ACCOUNTING

Original PGP Projects Published:

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.
 - PUBLISHED 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.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as REV. PROC. 2003-20 (released 1/22/2003)

Additional Projects:

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.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as REV. PROC. 2003-34.
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 rotatable spare parts.
 - WILL PUBLISH 4/14/2003 in IRB 2003-15 as REV. RUL. 2003-37.

23. Guidance on the tax treatment of fuel cost overrecoveries.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-39.
24. Guidance under section 263A regarding the simplified service cost and simplified production methods.
25. Final revenue procedure under section 442 regarding automatic accounting period change procedures for individuals.

TAX ADMINISTRATION

Original PGP Projects Published:

3. Modification of Rev. Proc. 97-31 regarding the TIN matching program for federal agencies to expand the scope of reporting agents included.
 - PUBLISHED 2/24/2003 in IRB 2003-8 as REV. PROC. 2003-9 (released 2/4/2003)
4. Proposed regulations under section 5891 on structured settlement factoring transactions.
 - PUBLISHED 2/19/2003 in FR as TD 9042.
8. Guidance under section 6011 regarding the disclosure of certain large transactions.
 - PUBLISHED 10/22/2002 in FR as TD 9017
 - PUBLISHED 3/4/2003 in FR as TD 9046
10. Guidance under section 6111 regarding corporate tax shelter registration.
 - PUBLISHED 10/22/2002 in FR as TD 9017
 - PUBLISHED 3/4/2003 in FR as TD 9046
11. Guidance under section 6112 regarding list of tax shelter investors.
 - PUBLISHED 10/22/2002 in FR as TD 9018
 - PUBLISHED 3/4/2003 in FR as TD 9046
13. Revenue procedure allowing a nonrequesting spouse to file a protest with Appeals regarding an innocent spouse claim under section 6015
 - PUBLISHED 2/3/2003 in IRB 2003-5 as REV. PROC. 2003-19
14. Guidance regarding information reporting and backup withholding for purchasing card transactions.
 - PUBLISHED 1/31/2003 in FR as TD 9041
 - PUBLISHED 2/24/2003 in IRB 2003-8 as NOTICE 2003-13 (released 10/4/2003)

15. Temporary regulations under section 6045 regarding information reporting relating to taxable stock transactions.
 - PUBLISHED 11/18/2002 in FR as TD 9022
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
36. Revenue ruling regarding the application of section 7503 with respect to the filing of returns as well as claims for credit or refund
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-41
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

Additional Projects:

45. Guidance under section 1363 regarding the effect of an 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 (released 10/4/2002)
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 (released 10/4/2002)
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 (released 10/4/2002)
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.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as REV. PROC. 2003-27
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.
 - PUBLISHED 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 1/21/2003 in FR as TD 9037

57. Final regulations under section 6103 regarding triangular disclosure of tax return information.
 - PUBLISHED 1/21/2003 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.
 - PUBLISHED 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.
 - PUBLISHED 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.
 - PUBLISHED 1/31/2003 in FR as TD 9040
63. Final regulations under section 6103 regarding disclosures to contractors.
 - PUBLISHED 3/12/2003 in FR as TD 9044
64. Announcement allowing domestic corporations and brokers to use a form letter in lieu of Form 1099-CAP.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as ANNOUNCEMENT 2003-7 (released 1/22/2003)
65. Revenue ruling describing substantive guidance issued in prior years that, due to changes in law or subsequent guidance, is obsolete.
66. Revenue ruling describing procedural guidance issued in prior years that, due to changes in law or subsequent guidance, is obsolete.
67. Revenue procedure dealing with exceptions from loss transactions.
 - PUBLISHED 3/17/2003 in IRB 2003-11 as REV. PROC. 2003-24 (released 2/27/2003)

68. Revenue procedure dealing with exceptions from transactions with significant book-tax difference.
 - PUBLISHED 3/17/2003 in IRB 2003-11 as REV. PROC. 2003-25 (released 2/27/2003)
69. Revenue ruling regarding section 6015 elections by an executor on behalf of a deceased spouse.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as REV. RUL. 2003-36
70. Revenue ruling regarding the estimated tax penalty safe harbor under section 6654 relating to the tax shown on the preceding year's return.
 - PUBLISHED 2/24/2003 in IRB 2003-8 as Rev. RUL. 2003-23
71. Final regulations regarding the prerequisites for bringing damage actions under section 7433.
 - PUBLISHED 3/25/2003 in FR as TD 9050 (released 3/19/2003)
72. Notice to update filing instructions in regulations to reflect the reorganization of the IRS.
 - PUBLISHED 4/7/2003 in IRB 2003-14 as NOTICE 2003-19 (released 3/11/2003)
73. Announcement providing interest relief for estates affected by the 9/11 terrorist attacks.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as ANNOUNCEMENT 2003-18
74. Notice regarding relief available to taxpayers serving in the Arabian Peninsula as part of Operation Iraqi Freedom.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as NOTICE 2003-21 (released 4/10/2003)
75. Revenue procedure providing for agreements with gaming industry employers and employees regarding the reporting of tip income.
76. Revenue procedure expanding the prefiling agreement program.
77. Revenue procedure modifying and making permanent the industry issue resolution program.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as REV. PROC. 2003-36 (released 4/17/2003)
78. Revenue procedure expanding General Appeals' mediation program for SBSE taxpayers.

79. Announcement establishing a tax exempt bond mediation dispute resolution pilot program.
80. Notice soliciting suggestions for the 2003-2004 Guidance Priority List.
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-26 (released 4/17/2003)

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)

Additional Projects:

11. Qualified public educational facility bonds - 2002 calendar year resident population.
 - PUBLISHED 8/12/2002 in IRB 2002-32 as NOTICE 2002-56 (released 7/25/2002)
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)
14. Notice on section 146(e) assignment of volume cap.
15. Notice on section 146(e) allocation of state ceiling.
16. Revenue ruling providing guidance on pooled financings-refinancings.
17. Notice on New York Liberty Bonds.