



DEPARTMENT OF THE TREASURY  
WASHINGTON, D. C. 20220

1999 PRIORITIES FOR  
TAX REGULATIONS AND OTHER ADMINISTRATIVE GUIDANCE

JOINT STATEMENT BY:

**The Honorable Donald C. Lubick**  
**Assistant Secretary (Tax Policy)**  
**U.S. Department of the Treasury**

**The Honorable Charles O. Rossotti**  
**Commissioner**  
**Internal Revenue Service**

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We are pleased to announce the 1999 Priority Guidance Plan. The plan reflects our commitment to provide more and better service to taxpayers as mandated by the IRS Restructuring and Reform Act of 1998. We are dedicated to doing a better job serving the public based on a better understanding of the taxpayers' point of view. We developed this far-reaching and inclusive Priority Guidance Plan after lengthy consultation with taxpayers, tax practitioners and industry groups.

The plan is different from its predecessors in a number of ways. First, it is more ambitious. The 1999 plan has over 230 guidance projects for the coming years – an increase of over 50 projects from last year.

Second, the 1999 Priority Guidance Plan demonstrates our continuing effort to implement recent legislation, including the two landmark pieces of legislation, the IRS Restructuring and Reform Act of 1998 and the Taxpayer Relief Act of 1997. Approximately 75 projects concern recent legislation. Implementing recent legislation is our top priority in the 1999 Priority Guidance Plan.

Third, these are not just our priorities; they are the American taxpayers' priorities and we are tailoring our plan to better meet their needs. Approximately 65 projects are aimed at providing relief or simplification for taxpayers (including electronic filing and similar initiatives).

The plan should not be viewed as an exclusive list of either the guidance that may be published in 1999 or the guidance and other matters to which the Internal Revenue Service and the Office of Tax Policy will devote attention in 1999. As in previous years, other areas currently under study ultimately may result in published guidance this year or in a later year. Moreover, the Internal Revenue Service and the Office of Tax Policy will respond to developments that may arise throughout the year.

In approaching any regulation, ruling or other guidance, we endeavor to provide clear and relatively simple rules that do not attempt to address every conceivable situation. We believe that this approach most effectively achieves our goal of providing helpful guidance to taxpayers without burdening them with undue complexity. We know that the success of our published guidance can be fully realized only if we have the benefit of the insight, experience and cooperation of the taxpayers who must apply the rules. Consequently, we invite the public to provide us with comments and suggestions as we write tax guidance.

In addition to the items on this year's plan, we have attached as Appendix A a list of certain projects for which substantial resources will be committed in 1999 and for which publication generally is expected to occur in 2000 (although in some instances publication may occur in 1999). We particularly invite comments on these projects. We have also attached as Appendix B a list of the more routine guidance that is published each year. Finally, for convenience, we have noted the projects on the 1999 Priority Guidance Plan published since completion of the 1998 Priority Guidance Plan and prior to March 8, 1999.

Additional copies of the 1999 Priority Guidance Plan can be obtained from the IRS homepage on the Internet under the Tax Pro's Corner ([www.irs.ustreas.gov](http://www.irs.ustreas.gov)) or by calling Treasury's Office of Public Affairs (202) 622-2960.

March 9, 1999

**OFFICE OF TAX POLICY  
and  
INTERNAL REVENUE SERVICE  
1999 PRIORITY GUIDANCE PLAN**

**Consolidated Returns**

1. Final regulations regarding transactions involving intercompany obligations.
2. Final regulations regarding reporting for the date an S corporation is acquired by a consolidated group.
3. Final regulations regarding the application of section 382 to a consolidated group.
4. Final regulations regarding the application of separate returns limitation year (SRLY) provisions to the use of a member's tax attributes by a consolidated group.
5. Modification of Treas. Reg. section 1.1502-77T regarding authorization to act for the consolidated group.

**Corporations and Their Shareholders**

1. Regulations regarding conversion of C corporation to RIC or REIT status. See Notice 88-19.
2. Proposed regulations under sections 338 and 1060.
3. Guidance regarding nonqualified preferred stock.
4. Guidance under section 355(d).
5. Guidance under section 355(e).
6. Final regulations under section 368 regarding the effect of redemptions and extraordinary dividends on continuity of interest.
7. Guidance under section 368 regarding the "solely for voting stock" requirement in certain reorganizations.
8. Reconsideration of ruling guidelines in Rev. Proc. 77-37 and Rev. Proc. 86-42 related to the continuity of interest and continuity of business enterprise requirements for a corporate reorganization under section 368.

9. Guidance under section 368 regarding mergers of a corporation with a disregarded entity.
10. Guidance under section 368 regarding the effect of a stock redemption program on continuity of interest.
11. Final regulations under section 1032 regarding the treatment of a disposition by one corporation of the stock of another corporation in a taxable transaction.
12. Guidance under section 1374 regarding sales of timber.

### **Employee Benefits**

#### A. Retirement Benefits

1. Guidance relating to plan loans under section 72(p).
2. Guidance relating to consolidated employee plans compliance resolution system (EPCRS).
3. Guidance on methods of correcting plan qualification violations relating to section 401(a)(17) and other qualification provisions.
4. Guidance relating to rollovers involving qualified plans under section 401(a)(31).
5. Final regulations relating to remedial amendment periods under section 401(b).
6. Guidance relating to cash or deferred arrangements under section 401(k).
7. Guidance on automatic enrollment relating to salary reduction contributions.
8. Guidance under section 401(m).
9. Guidance on methods of correcting failures to satisfy the section 401(k) and (m) average deferral percentage and actual contribution percentage tests.
10. Guidance relating to the use of electronic technologies in the administration of qualified plans.
11. Update of Notice 92-48 relating to the model notice under section 402(f).
12. Guidance on methods of determining and allocating earnings in connection with correction of a failure to make timely plan contributions.

13. Final regulations relating to Roth IRAs under section 408A. (Completed. See T.D. 8816.)
14. Guidance relating to reporting with respect to Roth IRAs under section 408A.
15. Guidance relating to the determination of earnings on excess IRA contributions.
16. Guidance on methods of correcting plan qualification violations relating to the exclusion of eligible employees from participation in a profit-sharing plan or in a cash or deferred arrangement under section 401(k).
17. Guidance relating to the application of section 411(a).
18. Proposed regulations relating to the application of the anticutback rules in certain circumstances under section 411(d)(6).
19. Final regulations under sections 411 and 417 relating to cashouts of benefits.
20. Guidance relating to funding issues under section 412.
21. Announcement relating to review of mortality tables under section 412(1)(7)(c)(ii)(III).
22. Guidance relating to the definition of highly compensated employee under section 414(q).
23. Guidance on methods of correcting plan qualification violations relating to amounts in excess of the limits under section 415.
24. Guidance relating to the effect of the repeal of section 415(e).
25. Guidance relating to the application of the retroactive annuity starting date provisions under section 417(a)(7).
26. Guidance relating to the application of plan qualification rules to certain duplicate pension accruals.
27. Guidance providing a one-year extension of the remedial amendment period for plan amendments relating to recent legislation.
28. Revenue procedure regarding the determination letter program for plan amendments relating to recent legislation.
29. Revised master and prototype program procedures for qualified plans.
30. Guidance relating to the application of section 1042(e) to transfers to partnerships.

31. Guidance on waiver of section 4971(b) excise tax in standard terminations of defined benefit plans.
32. Announcement relating to electronic transmittal of Form W-4P. (Completed. See Ann. 99-6.)

B. Health Care, Other Benefits and Employment Taxes

1. Final regulations revising Table I under section 79 relating to tax treatment of group-term life insurance.
2. Guidance under section 83.
3. Guidance under section 125 relating to cafeteria plans.
4. Guidance under section 132(f)(4).
5. Guidance relating to the accounting method changes required by the addition of section 404(a)(11).
6. Guidance on issues relating to nonqualified deferred compensation.
7. Guidance on application of reporting and withholding rules to funded governmental section 457(b) plans.
8. Guidance on deferred compensation plans of entities not subject to income tax.
9. Final regulations under section 3121(v) on application of FICA to nonqualified deferred compensation. (Completed. See T.D. 8814)
10. Final regulations under section 3221(d) regarding the exception to the railroad supplemental annuity tax.
11. Final regulations under section 3306(r) on application of FUTA to nonqualified deferred compensation. (Completed. See T.D. 8815)
12. Final regulations under section 4980B regarding COBRA requirements for health care continuation coverage. (Completed. See T.D. 8812)
13. Proposed regulations under section 4980B regarding certain COBRA requirements for health care continuation coverage. (Completed. See NPRM REG-121865-98)
14. Guidance on information reporting with respect to election workers.
15. Guidance regarding nondiscrimination requirements under section 9802 relating to the Health Insurance Portability and Accountability Act (HIPAA).

16. Guidance under section 9802(c) relating to HIPAA.
17. Guidance on issues arising under subtitle K (HIPAA).

### **Excise Taxes**

1. Guidance under section 4051 regarding the definition of highway vehicle in Treas. Reg. sections 145.4051 and 48.4061(a)-1.
2. Final regulations under section 4081 regarding kerosene excise tax and registration for heavy vehicles.
3. Final regulations under section 4251 regarding prepaid telephone cards.
4. Guidance under sections 4261 and 4271 regarding the transportation of persons and property by air.
5. Modification of Treas. Reg. section 41.6001 regarding reporting of vehicle identification numbers.
6. Guidance under section 6302 regarding deposit of excise taxes.

### **Exempt Organizations**

1. Guidance on the implications of issue advocacy and political intervention for section 501(c)(4) and section 527 organizations.
2. Guidance on the treatment of subsidiary income for purposes of the 85-percent member income test under section 501(c)(12).
3. Guidance under section 507 regarding termination of private foundation status.
4. Notice requesting comments regarding the application of existing rules on unrelated business taxable income, lobbying expenditures, and political intervention to Internet activities of tax-exempt organizations.
5. Final regulations under section 513 regarding travel and tour activities of tax-exempt organizations.
6. Guidance under section 513(i) regarding corporate sponsorship payments received by tax-exempt organizations.
7. Final regulations under section 529 regarding qualified state tuition programs.

8. Guidance regarding compliance by certain educational institutions with withholding and reporting requirements for payments to certain non-resident aliens.
9. Final regulations under section 4958 regarding excise taxes for certain excess benefit transactions.
10. Final regulations under section 6104 regarding the disclosure of certain documents by certain tax-exempt organizations.
11. Guidance under section 6104 regarding the disclosure of certain documents by private foundations.
12. Guidance regarding harassment campaign determinations under section 6104.

### **Financial Institutions and Products**

1. Guidance regarding the treatment of loan origination costs.
2. Guidance under section 446 regarding notional principal contracts and other financial instruments.
3. Proposed regulations under section 475 regarding electing traders and dealers. (Completed. See NPRM REG-104924-98.)
4. Revenue Procedure under section 475 regarding electing traders and dealers. (Completed. See Rev. Proc. 99-17.)
5. Guidance under section 562(c) regarding the treatment of waivers and reimbursements in certain regulated investment companies.
6. Guidance under section 860A regarding legending requirements for REMIC s.
7. Guidance under section 860H regarding financial asset securitization investment trusts.
8. Guidance under sections 1001 and 1275 regarding an election to treat a substitution of debt instruments, in certain circumstances, as a realization event. (Completed. See Rev. Proc. 99-18.)
9. Final regulations under section 1092(c)(4) regarding certain equity options that are listed on an exchange but do not have standard terms.
10. Guidance under section 1259 regarding constructive sales treatment for appreciated financial positions.



11. Guidance on the treatment of certain items relating to credit card transactions and on income from pools of prepayable obligations, including pools of credit card receivables.
12. Final regulations under section 1275 regarding inflation indexed bonds.
13. Additional guidance under section 1275.
14. Final regulations under section 7701(l) regarding lease stripping.
15. Final regulations under section 7701(l) regarding financing arrangements involving fast-pay stock.

### **General Tax Issues**

1. Final regulations under section 41 regarding the research credit.
2. Guidance under section 41 regarding computation of the research and experimentation tax credit in a controlled group.
3. Final regulations under section 42 relating to compliance and administrative errors.
4. Guidance under sections 51 and 51A regarding the consequences of certain transition employment.
5. Guidance under section 102 regarding individual development accounts.
6. Proposed regulations under section 110 regarding the information to be reported by a lessor and lessee.
7. Proposed regulations under section 118 regarding the definition of contribution in aid of construction.
8. Guidance under section 121 regarding the exclusion of gain on the sale of a principal residence.
9. Guidance under section 162 regarding certain leasing transactions .
10. Reconsideration of Rev. Rul. 66-9 and Rev. Rul. 73-51.
11. Guidance under section 170 regarding transactions involving insurance contracts.
12. Final regulations under section 197 regarding the amortization of intangibles.
13. Guidance under section 213 regarding medical expense deductions.

14. Guidance under section 1031.

### **Gifts, Estates, and Trusts**

1. Guidance under sections 1(h)(11) and 664 regarding the treatment of capital gains taken into account by charitable remainder trusts.
2. Proposed regulations under section 645 regarding an election by certain revocable trusts to be treated as part of the associated estate.
3. Final regulations under section 663 regarding the application of the separate share rule under subchapter J.
4. Final regulations under section 671 regarding reporting requirements for widely held fixed investment trusts.
5. Final regulations under section 2001(f) regarding the adequate disclosure of gifts.
6. Final regulations under section 2056 regarding the treatment of administrative expenses paid out of estate income.
7. Guidance in addition to Rev. Rul. 89-89 regarding the qualification of distribution(s) from an individual retirement account as qualified terminable interest property under section 2056(b)(7).
8. Proposed regulations under section 2057 regarding the estate tax exclusion for certain family owned business interests.
9. Guidance under section 2601 regarding modifications to a trust qualifying for a grandfather exception to the generation skipping transfer tax.
10. Guidance under section 2702 regarding the use of notes to satisfy the annuity payment requirement of a grantor retained annuity trust.
11. Regulations under section 7520 regarding actuarial tables.
12. Final regulations under sections 7701(a)(30) and (31) regarding the definition of a domestic trust. (Completed. See T.D. 8813.)

### **Insurance Companies and Products**

1. Guidance concerning issues related to Rev. Rul. 81-225.
2. Guidance regarding captive insurance companies.

3. Guidance under section 807.
4. Update of Rev. Proc. 92-25.
5. Final regulations under section 832(b)(4) regarding accounting for gross premiums written and unearned premiums.
6. Revenue procedure regarding uniform closing agreements for modified endowment contracts.

## **International Issues**

### A. Foreign Tax Credit

1. Proposed regulations regarding foreign tax credits. (See Notice 98-5.)
2. Regulations under section 904(d) regarding the application of the foreign tax credit limitation to separate categories of income.
3. Final regulations under sections 904(f) and 1502 regarding the treatment of overall foreign loss accounts upon leaving a consolidated group.

### B. Subpart F/Deferral

1. Proposed regulations under Subpart F on the treatment of branches, transparent entities, and related matters. (See Notice 98-35.)
2. Proposed regulations under subpart F on the treatment of income earned through partnerships.
3. Guidance under the passive foreign investment company provisions.

### C. Inbound Transactions

1. Guidance under section 894(c) regarding treaty benefits for payments through hybrid entities and related matters.
2. Guidance regarding withholding on payments to foreign persons.

### D. Outbound Transactions

1. Guidance under section 367(e) on certain outbound transfers of stock.
2. Notice under section 987 regarding the determination of income and exchange gain or loss of a branch with a functional currency different from that of its home office.

3. Proposed regulations under section 988 on hyperinflationary instruments.
4. Announcement regarding the treatment of certain foreign currency denominated contingent debt instruments under section 988.
5. Guidance on foreign sales corporation redeterminations.
6. Guidance on reporting requirements relating to foreign partnerships and partners.
7. Final regulations under section 6038B on transfers to foreign partnerships.

E. Sourcing and Expense Allocation

1. Proposed regulations under section 861 on the sourcing of compensation for labor or personal services, including fringe benefits.
2. Guidance on the sourcing of income from communications activities.
3. Guidance under section 864(e) on the allocation of interest expense.

F. Other

1. Final regulations under section 367(b).
2. Guidance under section 482 relating to transfer pricing.
3. Guidance on foreign trusts.
4. Final regulations under sections 861 through 865 regarding the source and character as effectively connected of income from cross-border financial transactions.
5. Guidance concerning income earned from shipping.
6. Final regulations under section 936 on substantial new lines of business.

**Partnerships**

1. Guidance regarding the application of the partnership provisions to capital gains.
2. Guidance regarding allocation of cancellation of indebtedness income under section 704.
3. Guidance regarding mergers and divisions of partnerships.
4. Guidance under section 752 regarding allocation of debt.

5. Final regulations under sections 743 and 755 regarding basis adjustments following sales of partnership interests.
6. Guidance under section 1032 regarding transfer by partnership of partner stock.
7. Final regulations under section 6031 regarding the filing of federal tax returns by certain foreign partnerships.
8. Proposed regulations regarding TEFRA partnership proceedings. (Completed. See NPRM REG-106564-98.)
9. Final regulations under section 7701 regarding elective conversion of an entity from partnership status to corporate status and vice versa.

### **Subchapter S**

1. Final regulations under section 1361 regarding qualified subchapter S subsidiaries.
2. Guidance under section 1361 regarding electing small business trusts.
3. Final regulations under section 1366 regarding the pass-through of items to S corporation shareholders.

### **Tax Accounting**

1. Guidance under section 167 regarding the income forecast method.
2. Guidance under section 195 regarding investigatory costs.
3. Guidance regarding the treatment of ISO 9000 costs.
4. Guidance regarding the treatment of costs of removing property that is replaced with other property, cyclical maintenance costs, sales commissions paid to obtain new customers, and mutual fund launch costs. (It is anticipated that two of these projects will be completed in 1999 and two will be completed in 2000.)
5. Final regulations under section 263A regarding farmers.
6. Regulations under section 263A regarding the historic absorption ratio method.
7. Regulations under section 274 regarding the receipt threshold and standard mileage deductions for leased automobile business use.
8. Guidance regarding change in accounting periods.

9. Update of Rev. Proc. 98-60 regarding automatic method change procedures.
10. Guidance under section 446 regarding the definition of method of accounting.
11. Guidance under section 446 regarding general procedures applicable to voluntary and involuntary changes in methods of accounting.
12. Guidance under sections 446 and 451 regarding the accrual acceptance method.
13. Guidance under sections 446 and 471 regarding the cash method of accounting.
14. Proposed regulations regarding the application of the installment method provisions to capital gains. (Completed. See NPRM REG-110524-98.)
15. Final regulations regarding the application of the installment method provisions to capital gains. (See project 14 above.)
16. Proposed regulations under section 460 regarding long-term contracts.
17. Final regulations under section 467 regarding certain payments for the use of property.
18. Update of Rev. Proc. 75-21.
19. Guidance under section 468B(g) regarding certain escrow funds. (Completed. See NPRM REG-209619-93.)
20. Guidance under section 472 regarding the dollar-value LIFO inventory method.
21. Clarification of the treatment of delay rentals under sections 263A and 612.
22. Guidance regarding contract termination payments.
23. Guidance under section 1301 regarding income averaging by farmers.

### **Tax Administration**

1. Final regulations under section 6011(e)(2) regarding magnetic media filing by partnerships.
2. Guidance under section 6011 regarding elimination of the ability to use magnetic tape for the reporting of Federal tax deposits.
3. Guidance under section 6011 regarding Form 1040 E-file and Form 1040 on-line.
4. Guidance under section 6011 regarding on-line filing of Form 941.

5. Guidance under section 6015 regarding equitable relief.
6. Guidance under section 6015 regarding election by spouse to limit joint and several liability.
7. Guidance under section 6041 regarding combined information reporting for parties in reorganizations.
8. Guidance under sections 6041 and 6651 regarding conforming changes required by the Internal Revenue Service Restructuring and Reform Act of 1998 (RRA '98).
9. Guidance under sections 6041 and 6045 regarding reporting responsibilities of a middleman payer.
10. Guidance under section 6045(f) regarding payments to attorneys.
11. Guidance under section 6050S regarding reporting of tuition and student loan interest.
12. Temporary regulations under section 6103(j) regarding census information. (Completed. See T.D. 8811.)
13. Final regulations under section 6109 regarding taxpayer identification numbers in connection with adoptions.
14. Guidance under section 6109 regarding alternative identification numbers for tax return preparers.
15. Guidance under section 6111 regarding the registration of confidential corporate tax shelters.
16. Guidance under section 6212 regarding last known address.
17. Final regulations under section 6302 regarding the \$1000 deposit threshold.
18. Regulations under section 6302(h) regarding the electronic federal tax payment system.
19. Proposed regulations under section 6323 regarding withdrawal of federal tax liens.
20. Proposed regulations under section 6343 regarding the return of property.
21. Final regulations under section 6402 to conform existing regulations to the shift of offset responsibility set forth in the Debt Collection Act.
22. Reconsideration of Rev. Rul. 88-98.

23. Guidance under section 6404(e) regarding abatement of interest.
24. Guidance under section 6404(g) regarding suspension of interest.
25. Guidance under section 6511 regarding disability suspension of time periods.
26. Guidance under section 6621(d) regarding certain procedural requirements for net zero rate interest for periods prior to the date of enactment of RRA '98.
27. Additional guidance under section 6621(d) regarding procedural requirements for net zero rate interest for periods prior to the date of enactment of RRA '98.
28. Guidance under section 6621(d) regarding net zero rate interest after date of enactment of RRA '98.
29. Guidance under section 7122 regarding offers in compromise.
30. Guidance under section 7123 regarding early referral of issues to the IRS Office of Appeals.
31. Guidance under section 7123 regarding expansion of the mediation program of the IRS Office of Appeals.
32. Guidance under section 7123 regarding a pilot arbitration program of the IRS Office of Appeals.
33. Guidance under section 7430 regarding qualified offers.
34. Guidance under section 7508A regarding disaster relief.
35. Guidance under section 7602 regarding third party contacts.
36. Guidance under section 7609 regarding third party record keepers.
37. Guidance under section 1001 of RRA '98 regarding ex parte communications between appeals officers and other IRS employees.
38. Review guidance previously issued to determine if such guidance is still appropriate and useful.

### **Tax-Exempt Bonds**

1. Regulations under section 141 regarding allocation and accounting provisions.
2. Regulations under section 141 regarding refundings.
3. Guidance under section 148 regarding investment type property.



4. Guidance under section 148 regarding guaranteed investment contracts.
5. Guidance under section 1397E regarding qualified zone academy bonds.

March 9, 1999

## APPENDIX A

1. Guidance under section 263A(f) regarding related party interest capitalization.
2. Guidance relating to the application of certain plan qualification rules to tax-exempt organizations.
3. Guidance under section 446 regarding the effect of credit risk on swap valuations.
4. Guidance under section 451 regarding the treatment of advance payments.
5. Guidance under section 817A.
6. Guidance under section 1092 regarding straddles where one position is bigger than the offsetting position.
7. Guidance under 1275 regarding original issue discount issues, including reporting requirements and reopenings.
8. Guidance regarding the applicability of the corporate alternative minimum tax to a consolidated group.
9. Guidance regarding estimated tax payments by corporations.
10. Final regulations under section 4980B regarding COBRA requirements for health care continuation coverage.
11. Final regulations under section 9801 (the Health Insurance Portability and Accountability Act (HIPAA)).
12. Guidance regarding Circular 230.

## APPENDIX B

### 1999 Regularly Scheduled Publication Items

#### January

1. Revenue Procedure updating the procedures for issuing private letter rulings, determination letters, and information letters on specific issues under the jurisdiction of the Chief Counsel.
2. Revenue Procedure updating the procedures for furnishing technical advice to district directors and chiefs, appeals offices, in the areas under the jurisdiction of the Chief Counsel.
3. Revenue Procedure updating the previously published list of "no-rule" issues under the jurisdiction of the Associate Chief Counsel (Domestic) and the Associate Chief Counsel (Employee Benefits and Exempt Organizations) on which advance letter rulings or determination letters will not be issued.
4. Revenue Procedure updating the previously published list of "no-rule" issues under the jurisdiction of the Associate Chief Counsel (International) on which advance letter rulings or determination letters will not be issued.
5. Revenue Procedure updating procedures for furnishing letter rulings, general information letters, etc., on matters relating to sections of the Code under the jurisdiction of the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations).
6. Revenue Procedure updating procedures for furnishing technical advice by the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations).
7. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
8. Revenue Ruling setting forth the prevailing state assumed interest rates provided for the determination of reserves under section 807 for contracts issued in 1998 and 1999.
9. Revenue Ruling providing the dollar amounts, increased by the 1999 inflation adjustment, for section 1274A.
10. Revenue Ruling setting forth the amount that section 7872 permits a taxpayer to lend to a qualified continuing care facility without incurring imputed interest, adjusted for inflation.
11. Revenue Procedure providing procedures for limitations on depreciation deductions for owners of passenger automobiles first placed in service during the calendar year; amounts to be included in income by lessees of passenger automobiles first leased during the calendar year; and the maximum allowable

value of employer-provided automobiles first made available to employees for personal use in the calendar year.

12. Revenue Procedure providing the domestic asset/liability percentages and domestic investment yield percentages for taxable years beginning after December 31, 1998, for foreign companies conducting insurance business in the U.S.
13. Revenue Procedure updating procedures for issuing determination letters on the qualified status of employee plans under sections 401(a), 403(a), 409, and 4975 of the Code.
14. Revenue Procedure updating the user fee program as it pertains to requests for letter rulings, determination letters, etc. on matters under the jurisdiction of the Office of the Assistant Commissioner (Employee Plans and Exempt Organizations).
15. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in January 1999.
16. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

### **February**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
3. Revenue Ruling under section 165 listing the Presidentially declared major disaster areas for the preceding calendar year.
4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in February 1999.

### **March**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Notice providing resident population of the states for determining the calendar year state housing credit ceiling under section 42(h), and the private activity bond volume cap under section 146.

3. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period January through March, 1999.
4. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period April through June, 1999.
5. Notice providing a tentative determination under section 809 of the differential earnings rate for 1998 and the recomputed differential earnings rate for 1997 for use by mutual life insurance companies to compute their income tax liabilities for 1998.
6. Revenue Ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the first half of 1999 for use in valuing personal flights on employer-provided aircraft.
7. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in March 1999.
8. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

#### April

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Ruling providing the average annual effective interest rates charged by each Farm Credit Bank District.
3. Notice providing the inflation adjustment factor, nonconventional fuel source credit, and reference price for the calendar year that determines the availability of the credit for producing fuel from a nonconventional source under section 29.
4. Revenue Procedure providing a current list of countries and the dates those countries are subject to the section 911(d)(4) waiver and guidance to individuals who fail to meet the eligibility requirements of section 911(d)(1) because of adverse conditions in a foreign country.
5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in April 1999.
6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

## **May**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in May 1999.
3. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
4. Revenue Procedure under section 6012 regarding the magnetic media filing of Forms 1040NR for 1998.
5. Revenue Procedure providing guidance for use of the national and area median gross income figures by issuers of qualified mortgage bonds and mortgage credit certificates in determining the housing cost/income ratio under section 145.

## **June**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period April through June, 1999.
3. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period July through September, 1999.
4. Notice providing the calendar year inflation adjustment factor and reference prices for the renewable electricity production credit under section 45.
5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in June 1999.
6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

## **July**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.

2. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in July 1999.
3. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

### **August**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Procedure providing the amounts of unused housing credit carryover allocated to qualified states under section 42(h)(3)(D) for the calendar year.
3. Notice providing the inflation adjustment factor to be used in determining the enhanced oil recovery credit under section 43 for tax years beginning in the calendar year.
4. Notice providing the applicable percentage to be used in determining percentage depletion for marginal properties under section 613A for the calendar year.
5. Revenue Procedure providing the loss payment patterns and discount factors for the 1999 accident year to be used for computing unpaid losses under section 846.
6. Revenue Procedure providing the salvage discount factors for the 1999 accident year to be used for computing discounted estimated salvage recoverable under section 832.
7. Revenue Ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the second half of 1999 for use in valuing personal flights on employer-provided aircraft.
8. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in August 1999.
9. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

### **September**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.

2. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period July through September, 1999.
3. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period October through December, 1999.
4. Revenue Ruling providing the determination under section 809 of the differential earnings rate for 1998 and the recomputed differential earnings rate for 1997 for use by mutual life insurance companies to compute their income tax liabilities for 1998.
5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in September 1999.
6. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
7. Notice setting forth a list of designated private delivery services for purposes of the "timely mailing as timely filing/paying" rule of section 7502 of the Code.
8. Announcement on whether the number of medical savings accounts has exceeded the applicable statutory limits under the Health Portability and Accountability Act of 1996.
9. Revenue Procedure under section 62 regarding the deduction and deemed substantiation of federal standard mileage amounts.

### **October**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. News release setting forth cost-of-living adjustments effective January 1, 2000, applicable to the dollar limits on benefits under qualified defined benefit pension plans and other provisions affecting certain plans of deferred compensation.
3. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in October 1999.
4. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.



## **November**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Ruling providing the "base period T-Bill rate" as required by section 995(f)(4).
3. Revenue Ruling setting forth covered compensation tables for the 2000 calendar year for determining contributions to defined benefit plans and permitted disparity.
4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in November 1999.
5. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

## **December**

1. Revenue Ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 1274, 1288, 382, 42, and 7520.
2. Revenue Ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period October through December, 1999.
3. Revenue Ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period January through March, 2000.
4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) of the Code for plan years beginning in December 1999.
5. Revenue Ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
6. Revenue Procedure under section 1 and other sections of the Code regarding the inflation adjusted items for 2000.
7. Revenue Procedure under section 62 regarding the deduction and deemed substantiation of federal travel per diem amounts.
8. Revenue Procedure under section 6662 regarding what information shown on a return is an adequate disclosure.

9. Revenue Procedure setting forth, pursuant to section 1397E of the Code, the maximum face amount of Qualified Zone Academy Bonds that may be issued for each state during 2000.