



DEPARTMENT OF THE TREASURY
WASHINGTON, DC 20220

April 18, 2003

Department of the Treasury
Third Quarterly Update of the 2002 - 2003 Priority Guidance Plan

Joint Statement by:

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We are pleased to announce the third quarterly update of the 2002 - 2003 Priority Guidance Plan.

On July 10, 2002, we released the 2002 - 2003 Priority Guidance Plan listing 250 projects for the plan year beginning July 1, 2002 and ending June 30, 2003. In our Joint Statement that accompanied the release of the 2002 - 2003 Priority Guidance Plan, we emphasized our commitment to increased and more timely published guidance. We indicated that we would update the plan quarterly to reflect additional guidance that we intend to publish during the plan year. We expressed our intent to add a number of revenue rulings and revenue procedures not previously reflected on the plan. Updating the plan also provides flexibility to respond to developments arising during the year.

The attached update sets forth the guidance on the original 2002 - 2003 Priority Guidance Plan, as previously updated, that we have published. Although the update may indicate that a particular item on the plan has been completed, it is possible that one or more additional projects may be completed in the plan year relating to that item. The update also includes 45 items of additional guidance for the third quarter, some of which have already been published. As promised, many of the additional items are revenue rulings and revenue procedures.

Some of the additional guidance projects were identified from suggestions received from taxpayers and practitioners. We continue to invite the public to

provide us with comments and suggestions as we identify and write guidance throughout the plan year.

The updated 2002 -2003 Priority Guidance Plan will be republished on the IRS website on the Internet (www.irs.gov) under Tax Professionals, IRS Resources, Administrative Information and Resources, 2002 - 2003 Priority Guidance Plan. Copies can also be obtained by calling Treasury's Office of Public Affairs at (202) 622-2960.

OFFICE OF TAX POLICY
AND
INTERNAL REVENUE SERVICE
2002 - 2003 PRIORITY GUIDANCE PLAN
MARCH 31, 2003 UPDATE

CONSOLIDATED RETURNS

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
2. Guidance under section 1502 regarding transactions involving obligations of consolidated group members.
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
4. Guidance regarding continuation of a consolidated group in certain transactions.

CORPORATIONS AND THEIR SHAREHOLDERS

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
3. Final regulations regarding taxable asset acquisitions and dispositions of insurance companies.
4. Guidance regarding the acquisition of businesses having certain nonqualified settlement funds.
5. Guidance regarding the availability of a section 338(h)(10) election in multi-step transactions.
6. Guidance regarding requests for rulings under section 355.

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)
8. Guidance under section 355(e).
9. Guidance regarding the assumption of liabilities in certain transfers of property.
10. Guidance regarding mergers with disregarded entities.
 - PUBLISHED 1/24/2003 in FR as TD 9038
11. Guidance under section 368 regarding mergers with or into a foreign corporation.
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 1/22/2003)
13. Guidance regarding restricted stock in reorganizations.
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
15. Guidance under section 368(a)(1)(F).
16. Guidance regarding attribute reduction for cancellation of indebtedness.
17. Guidance under section 1374 regarding liquidations of C corporations.
18. Guidance regarding mergers of insolvent corporations.
19. Revenue procedure regarding section 301.9100-3 relief for section 338 elections.
(3rd)
 - WILL PUBLISH 4/21/2003 in IRB 2003-16 as REV. PROC. 2003-33 (released 4/2/2003)

EMPLOYEE BENEFITS

A. Retirement Benefits

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
3. Final regulations under section 401(a)(9) on required minimum distributions.
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)
5. Guidance under section 401(a)(28) regarding valuation timeliness and procedural requirements.
6. Guidance relating to cash or deferred arrangements under section 401(k) and relating to section 401(m).
7. Guidance relating to annuity plans under section 403(b).
8. Final regulations relating to the calculation of net income attributable to returned or recharacterized IRA contributions.
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)
13. Guidance on the use of aggregate entry age normal funding method under section 412.
14. Guidance under section 412(c)(9).
15. Guidance relating to the definition of highly compensated employee.

16. Final regulations under section 414(v) on catch up contributions for individuals age 50 or over.
17. Guidance on disclosure to participants regarding their distributions from pension plans.
 - PUBLISHED 10/7/2002 in FR as NPRM REG-124667-02
18. Final regulations relating to the application of the retroactive annuity starting date provisions under section 417(a)(7).
19. Final regulations relating to section 457 plans.
20. Guidance on reporting and withholding for section 457 plans.
21. Guidance under section 1042 regarding statements of purchase of replacement property.
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
23. Revenue procedure amending and restating employee plans compliance resolution system (EPCRS).
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. (1st)
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-73
25. Revenue ruling on recovery of plan overpayment. (1st)
 - 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. (1st)
27. Revenue procedure on statute of limitations under section 4971. (1st)
28. Revenue ruling on the effect of EGTRRA on the elimination of optional forms of benefit in defined contribution plans. (1st)
29. Proposed regulations on the application of section 401(a)(4) for cash balance plans. (1st)
 - 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. (1st)
 - 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. (2nd)
 - PUBLISHED 1/21/2003 in IRB 2003-3 as NOTICE 2003-6 (released 12/20/2002)
32. Notice regarding section 401(a)(9) reporting. (2nd)
 - 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. (2nd)
 - 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). (2nd)
 - 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. (2nd)
 - 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). (2nd)
37. Guidance on prohibited allocations of securities in an S corporation. (3rd)
38. Proposed regulations under section 408(q) deemed IRAs. (3rd)

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

1. Guidance under section 83 and 162 on compensation expense deductions relating to stock options outstanding at the time of a corporate buy-out.
2. Guidance under sections 83 and 451 regarding non-statutory stock option converted to nonqualified deferred compensation.
3. Guidance under sections 83, 451 and 1032 regarding a rabbi trust established by a parent corporation to satisfy the nonqualified deferred compensation obligations of the parent and its subsidiary.

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
6. Guidance under sections 105(b) and 125 on use of debit cards for flexible spending arrangements.
7. Final regulations on golden parachute rules under section 280G.
8. Final regulations under section 419A(f)(6).
9. Guidance on incentive stock options under section 422.
10. Revision of standards set forth in Rev. Proc. 71-19 regarding nonqualified deferred compensation.
11. Guidance under section 3121 regarding the definition of "salary reduction arrangement".
12. Guidance on the employment tax treatment of bonuses paid to employees on the signing of a collectively bargained agreement.
13. Guidance on FICA and FUTA tax with respect to incentive stock options under section 422 and employee stock purchase plans under section 423.
14. Guidance on the employment taxation and reporting requirements applicable to interests in nonstatutory stock options and deferred compensation transferred to a former spouse incident to a divorce.
15. Guidance regarding application of the Hospital Insurance tax to employees covered under section 3121(b)(7)(F).
16. Guidance under section 3504.
17. Final regulations under section 9801 relating to HIPAA.
18. Notice regarding effective date of Rev. Proc. 2002-41. (1st)
 - 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. (1st)

20. Notice regarding leave donation programs. (1st)
 - 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. (1st)
 - 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. (1st)
23. Withdrawal of proposed regulations under section 3321 regarding imposition of Railroad Unemployment Repayment Tax. (1st)
 - PUBLISHED 11/7/2002 in FR as REG-209116-89
24. Revenue ruling on application of section 4980 to transfer of excess assets. (1st)
25. Revenue ruling on application of section 4980B in divorce situations. (1st)
 - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-88
26. Announcement regarding Form W-2, Code V. (2nd)
 - 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. (2nd)
28. Notice on certain offshore deferred compensation arrangements involving domestic and foreign employee leasing companies. (3rd)
 - 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. (3rd)

EXCISE TAXES

1. Guidance under sections 4041 and 4081 regarding biodiesel. (1st)
 - PUBLISHED 11/18/2002 in IRB 2002-46 as REV. RUL. 2002-76
2. Final regulations under section 4051 regarding the definition of highway vehicle in regulation sections 145.4051 and 48.4061(a)-1.
3. Proposed regulations regarding the definition of highway tractors subject to the heavy truck tax under section 4051.

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
7. Proposed regulations under section 6416(a)(4) regarding claims for gasoline tax.
8. Revenue ruling under section 4261 regarding the sales of frequent flyer miles. (1st)
 - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. RUL. 2002-60
9. Proposed regulations under section 4252 regarding toll telephone services. (3rd)
 - PUBLISHED 4/1/2003 in FR as NPRM REG-141097-02

EXEMPT ORGANIZATIONS

1. Guidance on joint ventures between exempt organizations and for-profit companies.
2. Guidance on section 501(c)(4) organizations.
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)
5. Guidance on the application of existing UBIT rules to the Internet activities of exempt organizations.
6. Regulations under section 529 regarding qualified tuition programs.
7. Guidance on split interest trusts.
8. Form 990 series developments and request for comments regarding proposed changes. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
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. (3rd)
 - 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. (3rd)
15. Revenue ruling on application of section 45B to social clubs. (3rd)

FINANCIAL INSTITUTIONS AND PRODUCTS

1. Guidance regarding accruals on sales of REMIC regular interests between payment dates.
2. Regulations under section 263(g).
3. Guidance under section 265(a)(2).
4. Guidance on derivative contracts.
5. Final regulations under section 475.
6. Guidance addressing valuation under section 475.
7. Guidance on the treatment of certain obligations backed by Treasury securities for RIC diversification purposes.
8. Guidance on the treatment under section 856(c)(4)(A) of certain loans secured by interests in real estate partnerships.

9. Guidance on customary services performed by REITs.
10. Guidance addressing the treatment of inducement fees for REMIC residual interests.
11. Guidance under section 7872.
12. Notice clarifying Notice 2001-10 and Notice 2002-8. (1st)
 - 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. (1st)
 - 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). (1st)
 - PUBLISHED 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-71
15. Revenue ruling regarding section 1259 re-established positions. (1st)
 - PUBLISHED 1/21/2003 in IRB 2003-3 as REV. RUL. 2003-1
16. Revenue ruling regarding treatment of forward contract with significant variation. (2nd)
 - 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. (2nd)
 - 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. (2nd)
 - 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). (2nd)
20. Guidance regarding the characterization of income for REIT qualification purposes. (3rd)

GENERAL TAX ISSUES

1. Proposed regulations under section 21 regarding the credit for household and dependent care expenses.

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. (1st)
 - PUBLISHED 12/26/2002 in FR as TD 9034
4. Guidance under section 32 regarding temporary absences and the abode requirement.
5. Other guidance under section 32.
 - PUBLISHED 3/6/2003 in FR as TD 9045
6. Guidance under section 41 regarding the research credit.
7. Regulations under section 41 regarding the computation of the research tax credit in a controlled group.
8. Proposed regulations under sections 1.42-6 and 1.42-14 to conform to statutory changes.
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
10. Guidance under section 43 regarding enhanced oil recovery.
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)
12. Proposed regulations under sections 46 and 167 relating to normalization.
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

17. Guidance under section 126 regarding the Conservation Reserve Program.
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
20. Guidance under section 165 regarding the deduction for worthless stock of subsidiaries for which an election under the check-the-box regulations has been made.
21. Final regulations under section 167 regarding the income forecast method.
22. Proposed regulations under section 168 relating to like-kind exchanges.
23. Guidance under section 168 regarding depreciation of property for which the use changes.
24. Guidance under sections 168 and 1400L regarding special depreciation allowance.
25. Guidance under section 168 regarding the depreciation of cable television systems.
26. Guidance under section 168 regarding the recovery period on depreciation of gasoline pump canopies.
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
28. Final regulations under section 221 regarding interest on education loans.
29. Guidance under section 280F regarding vans and light trucks.
30. Proposed regulations under section 465 regarding interest other than as a creditor.
31. Final regulations under section 469 regarding self-charged interest.
 - PUBLISHED 8/21/2002 in FR as TD 9013
32. Guidance under section 1031 regarding ongoing multiple exchanges of property.

33. Final regulations under section 1041 regarding when transfers of property to third parties are made “on behalf of” the nontransferring spouse. (1st)
 - PUBLISHED 1/13/2003 in FR as TD 9035
34. Guidance on corporations chartered under Indian tribal law.
35. Notice under section 45D regarding other federal tax benefits. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
40. Revenue procedure regarding the election under section 1397B. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
45. Revenue procedure under section 1400I regarding the commercial revitalization deduction. (1st)

46. Guidance regarding advance rentals. (2nd)
 - 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. (2nd)
 - PUBLISHED 4/7/2003 in IRB 2003-14 as NOTICE 2003-18
48. Guidance under section 274 regarding the use of statistical sampling. (2nd)
49. Revenue ruling under section 45D regarding leveraged partnerships. (2nd)
 - 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. (3rd)
51. Revenue ruling under section 170 regarding the deduction for charitable contributions of patents. (3rd)
 - PUBLISHED 3/17/03 in IRB 2003-11 as REV. RUL. 2003-28.
52. Guidance under section 172 regarding specified liability losses. (3rd)
53. Revenue ruling under section 213 regarding the deduction for medical expenses. (3rd)
54. Final regulations under section 274 regarding substantiation of incidental expenses. (3rd)
55. Revenue ruling under section 42(d)(4)(C) regarding community service facilities. (3rd)
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. (3rd)

GIFTS, ESTATES AND TRUSTS

1. Final regulations under section 643 regarding state law definition of income for trust purposes.
2. Final regulations under section 645 regarding an election by certain revocable trusts to be treated as part of the associated estate. (1st)
 - PUBLISHED 12/24/2002 in FR as TD 9032
3. Update revenue procedures under section 664 containing sample charitable remainder annuity trust provisions.

4. Update revenue procedures under section 664 containing sample charitable remainder unitrust provisions.
5. Guidance under section 664 regarding capital gains for charitable remainder trusts.
6. Final regulations under section 671 regarding reporting requirements for widely held fixed investment trusts.
7. Guidance under sections 671 and 2036 regarding tax reimbursement provisions in grantor trusts.
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
9. Final regulations under sections 2055 and 2522 based on the Boeshore decision.
10. Regulations under section 2519 regarding net gifts.
11. Guidance under section 2642 regarding issues relating to the generation-skipping transfer tax exemption.
12. Guidance under section 2702 providing model qualified personal residence trust provisions.
13. Revenue ruling under section 2201, as amended by the Victims of Terrorism Relief Act of 2001, providing sample computations of the estate tax. (1st)
 - 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. (1st)
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-40
15. Revenue ruling under section 2057 regarding recapture. (3rd)

INSURANCE COMPANIES AND PRODUCTS

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
2. Final regulations under section 817A.

3. Guidance regarding basis when annuity contracts are divided and exchanged under section 1035.
4. Guidance regarding split-dollar life insurance.
5. Revenue ruling regarding the aggregation of annuity contracts. (1st)
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-75
6. Revenue ruling regarding viatical settlement company licensing requirement. (1st)
 - PUBLISHED 12/23/2002 in IRB 2002-51 as REV. RUL. 2002-82
7. Revenue procedure regarding composite method for loss reserve discounting. (1st)
 - PUBLISHED 12/23/2002 in IRB 2002-51 as REV. PROC. 2002-74
8. Notice regarding treatment of certain re-insurance transactions. (1st)
 - PUBLISHED 11/4/2002 in IRB 2002-44 as NOTICE 2002-70.
9. Revenue ruling regarding special estimated tax payments under section 847. (3rd)
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as REV. RUL. 2003-34

INTERNATIONAL ISSUES

A. Subpart F/Deferral

1. Guidance on previously taxed earnings and profits under section 959.
2. Guidance on PFIC provisions.
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

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
3. Guidance on securities lending.
4. Final regulations relating to ITINs on expedited basis.
 - PUBLISHED 11/22/2002 in FR as TD 9023

5. Regulations relating to TINs under section 1445.
6. Guidance under section 1503(d).
7. Regulations relating to the reporting of bank deposit interest.

C. Outbound Transactions

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
2. Guidance on “extraordinary transactions”.

D. Foreign Tax Credits

1. Final regulations under sections 902 and 904.
2. Guidance on change of taxable year and foreign tax credits.
3. Guidance on 10/50 company look-through.
 - PUBLISHED 1/21/2003 in IRB 2003-3 as NOTICE 2003-5 (released 12/23/2002)

E. Transfer Pricing

1. Regulations relating to stock option compensation under section 482.
2. Guidance on treatment of cross-border services.
3. Guidance on cost sharing under section 482.
4. Guidance on APA process (see Rev. Proc. 96-53).
5. Guidance on global dealing.

F. Sourcing and Expense Allocation

1. Guidance on interest expense apportionment.
2. Guidance relating to the treatment of fringe benefits.
3. Regulations under section 883.
4. Guidance under section 863(d) and (e).

G. Other

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
2. Guidance on taxation of individuals in the possessions.
3. Guidance concerning the treatment of currency gain or loss.
4. Proposed regulations under section 1446.
5. Proposed regulations regarding partner filing requirements for controlled foreign partnerships under section 6038. (1st)
 - 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. (2nd)
 - 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. (3rd)
 - PUBLISHED 4/14/2003 in IRB 2003-15 as ANNOUNCEMENT 2003-19
8. Announcement of agreement relating to certain investments by Dutch pension funds. (3rd)
 - 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. (3rd)
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-25 (released 4/11/2003)

PARTNERSHIPS

1. Proposed regulations under section 460 regarding partnership transactions for long-term contracts.
2. Guidance under section 704(b) regarding capital account book-up.
3. Guidance under section 704(b) regarding the allocation of foreign tax credits.
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
7. Proposed regulations under section 752 regarding the assumption of partnership liabilities.
8. Guidance regarding disregarded entities and collection issues.
9. Final regulations regarding the coordination of sections 755 and 1060.
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
12. Revenue ruling under sections 752 and 1031 regarding partnership like-kind exchanges. (3rd)

SUBCHAPTER S

1. Final regulations under section 1361 regarding the time for beneficiary to make a QSST election.
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)
3. Guidance under section 1362 regarding late S corporation elections.
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)
5. Revenue ruling under section 1361 regarding QSUB elections. (1st)

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

2. Guidance on deduction and capitalization of costs incurred by utilities to maintain assets used to generate power.
3. Proposed regulations under sections 162 and 263 regarding deduction and capitalization of expenditures.
 - PUBLISHED 12/19/2002 in FR as NPRM REG-125638-01
4. Guidance under sections 162, 165, and 263 on the treatment of preproduction costs of creative property.
5. Revenue ruling under sections 164 and 461 on the accrual of the deduction for franchise tax payments under California law.
6. Revenue procedure under section 442 regarding automatic annual accounting period change procedures for individuals.
 - PUBLISHED 11/25/2002 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
12. Guidance under section 461 on the proper treatment of Medicaid rebates paid by pharmaceutical companies.
13. Final regulations under section 468B regarding certain escrow funds.
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)
16. Guidance under section 1341 regarding claim of right.
 17. Guidance amplifying and clarifying revenue procedures under section 442 regarding changes in annual accounting period. (1st)
 - PUBLISHED 1/18/2002 in IRB 2002-46 as NOTICE 2002-72
 18. Guidance under section 263A(f) regarding safe harbor leasing transactions. (2nd)
 19. Update of Rev. Proc. 77-12 regarding valuation of inventories. (2nd)
 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. (2nd)
 - 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. (2nd)
 22. Guidance on the tax treatment of rotatable spare parts. (2nd)
 - WILL PUBLISH 4/14/2003 in IRB 2003-15 as REV. RUL. 2003-37
 23. Guidance on the tax treatment of fuel cost overrecoveries. (2nd)
 - 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. (3rd)
 25. Final revenue procedure under section 442 regarding automatic accounting period change procedures for individuals. (3rd)

TAX ADMINISTRATION

1. Final regulations implementing section 66(c) regarding innocent spouse relief in community property jurisdictions.
2. Final regulations under section 3406 clarifying the counting of notices to payors when multiple notices are received.
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
5. Final regulations regarding electronic payee statements.
6. Proposed regulations under section 6011 to remove impediments to electronic filing of certain business returns.
7. Update Rev. Proc. 96-17 to provide the current requirements for completing and submitting Form 8655, Reporting Agent Authorization for Magnetic Tape / Electronic Filers.
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
9. Annual compilation of Tax Shelter Listed Transactions under section 6011.
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
12. Update Rev. Proc. 2000-15 regarding equitable relief under sections 6015(f) and 66(c).
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 TEMP 9022

16. Final regulations under section 6050S regarding information reporting for qualified tuition and related expenses.
 - PUBLISHED 12/19/2002 in FR as TD 9029
17. Proposed regulations under section 6081 to remove the signature requirement for filing Form 8809.
18. Final regulations under section 6103 regarding nonwritten (oral) consents.
19. Proposed regulations under section 6103 regarding the disclosure of unrelated third party tax information in tax proceedings.
20. Proposed regulations under section 6103 regarding disclosures for investigative purposes.
21. Proposed regulations regarding the ability of a return preparer to furnish a completed copy of an income tax return to the taxpayer using a medium other than paper.
22. Proposed regulations under section 6159 regarding installment agreements.
23. Guidance regarding the use of summary assessment procedures with respect to claimed Black Reparations and similar credits.
24. Regulations under section 6213 regarding math error assessments based on a Form W-2.
25. Proposed regulations under section 6334 regarding seizures of principal residences and certain business assets.
26. Proposed regulations regarding the suspension of the statute of limitations for noncompliance with a designated summons.
27. Proposed regulations under section 6655 regarding estimated tax payments by corporations.
28. Reconsideration of Rev. Rul. 75-191 regarding the failure-to-deposit penalty where employment taxes should have been withheld but were not.
29. Proposed regulations regarding a waiver of information reporting penalties when errors are rectified promptly.
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
32. Revenue Procedure regarding the LMSB Fast Track Program.
33. Guidance necessary to facilitate electronic tax administration.
34. Final regulations under section 7430 regarding qualified offers.
35. Proposed regulations under section 7430 regarding miscellaneous changes made by TRA 97 and RRA 98.
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
38. Proposed regulations regarding third party and John Doe summonses.
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
41. Update Rev. Proc. 87-24 regarding docketed Tax Court cases.
42. Proposed regulations regarding testimony authorizations and requests for IRS information.
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 Statement of Procedural Rules REG-251003-96
45. Notice under section 1363 regarding the effect of an S corporation election. (1st)
 - PUBLISHED 1/21/2003 in IRB 2003-3 as Notice 2003-4
46. Proposed regulations under various provisions regarding adjustments under section 481(a) for changes in accounting method. (1st)

47. Guidance regarding tax shelter transactions involving a straddle, a tiered partnership, a transitory partner, and the absence of a section 754 election. (1st)
 - PUBLISHED 7/15/2002 in IRB 2002-28 as NOTICE 2002-50
48. Guidance regarding tax shelter transactions involving S corporation/ partnership straddles. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (1st)
 - 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. (2nd)
 - 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. (2nd)
 - PUBLISHED 1/21/2003 in FR as TD 9037
57. Final regulations under section 6103 regarding triangular disclosure of tax return information. (2nd)
 - PUBLISHED 1/21/2003 in FR as TD 9036
58. Final regulations applying section 6331(k) to installment agreements. (2nd)
 - 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. (2nd)
 - 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. (2nd)
 - PUBLISHED 12/31/2002 in FR as NPRM REG-126016-01
61. Notice regarding the effective date of tax shelter registrations. (2nd)
 - 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. (2nd)
 - PUBLISHED 1/31/2003 in FR as TD 9040
63. Final regulations under section 6103 regarding disclosures to contractors. (2nd)
 - 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. (2nd)
 - 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. (3rd)
66. Revenue ruling describing procedural guidance issued in prior years that, due to changes in law or subsequent guidance, is obsolete. (3rd)
67. Revenue procedure dealing with exceptions from loss transactions. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
 - 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. (3rd)
76. Revenue procedure expanding the prefiling agreement program. (3rd)
77. Revenue procedure modifying and making permanent the industry issue resolution program. (3rd)
 - 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. (3rd)

79. Announcement establishing a tax exempt bond mediation dispute resolution pilot program. (3rd)
80. Notice soliciting suggestions for the 2003-2004 Guidance Priority List. (3rd)
 - WILL PUBLISH 5/5/2003 in IRB 2003-18 as NOTICE 2003-26 (released 4/17/2003)

TAX EXEMPT BONDS

1. Regulations under section 141 regarding allocation and accounting provisions.
2. Regulations under section 141 regarding refunding.
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
5. Final regulations under sections 141 and 148 regarding prepayments.
6. Regulations under section 142 regarding solid waste disposal facilities.
7. Regulations under section 148 regarding brokers' commissions and similar fees.
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)
9. Guidance under section 150 regarding change in use provisions.
10. Guidance on correction alternatives and voluntary compliance for tax-exempt bond provisions.
11. Qualified public educational facility bonds - 2002 calendar year resident population. (1st)
 - PUBLISHED 8/12/2002 in IRB 2002-32 as NOTICE 2002-56 (released 7/25/2002)
12. Guidance under section 146. (1st)
13. Liberty Zone advance refunding notice. (2nd)
 - 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. (3rd)
15. Notice on section 146(e) allocation of state ceiling. (3rd)
16. Revenue ruling providing guidance on pooled financings-refinancings. (3rd)
17. Notice on New York Liberty Bonds. (3rd)

APPENDIX - Regularly Scheduled Publications

JULY 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 7/8/2002 in IRB 2002-27 as REV. RUL. 2002-40
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) for plan years beginning in July 2002.
 - PUBLISHED 7/22/2002 in IRB 2002-29 as NOTICE 2002-49
3. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 7/22/2002 in IRB 2002-29 as REV. RUL. 2002-47

AUGUST 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 8/5/2002 in IRB 2002-31 as REV. RUL. 2002-48
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.
 - PUBLISHED 9/9/2002 in IRB 2002-36 as REV. PROC. 2002-56
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.
 - PUBLISHED 7/29/2002 in IRB 2002-30 as NOTICE 2002-53
4. Notice providing the applicable percentage to be used in determining percentage depleting for marginal properties under section 613A for the calendar year.
 - PUBLISHED 7/29/2002 in IRB 2002-30 as NOTICE 2002-54

5. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the second half of 2002 for use in valuing personal flights on employer-provided aircraft.
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-56
6. 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) for plan years beginning in August 2002.
 - PUBLISHED 8/19/2002 in IRB 2002-33 as NOTICE 2002-57
7. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 8/26/2002 in IRB 2002-34 as REV. RUL. 2002-52
8. Update Notice 2001-62 to add approved applicants for designated private delivery service status under section 7502(f). Will be published only if any new applicants are approved.
 - PUBLISHED 9/30/2002 in IRB 2002-39 as NOTICE 2002-62

SEPTEMBER 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. RUL. 2002-53
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, 2002.
 - PUBLISHED 8/19/2002 in IRB 2002-33 as REV. RUL. 2002-51
3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period October through December 2002.
 - PUBLISHED 9/23/2002 in IRB 2002-38 as REV. RUL. 2002-59
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) for plan years beginning in September 2002.
 - PUBLISHED 9/23/2002 in IRB 2002-38 as NOTICE 2002-61
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-57

6. Revenue procedure under section 62 regarding the deduction and deemed substantiation of federal standard mileage amounts.
 - PUBLISHED 9/30/2002 in IRB 2002-39 as REV. PROC. 2002-61
7. Announcement on whether the number of Archer MSAs has exceeded the applicable statutory limits.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as ANNOUNCEMENT 2002-90
8. Revenue procedure under section 62 regarding the deduction and deemed substantiation of federal travel per diem amounts.
 - PUBLISHED 10/15/2002 in IRB 2002-41 as REV. PROC. 2002-63

OCTOBER 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. RUL. 2002-61
2. News release setting forth cost-of-living adjustments effective January 1, 2003, applicable to the dollar limits on benefits under qualified defined benefit pension plans and other provisions affecting certain plans of deferred compensation.
 - PUBLISHED 11/12/2002 in IRB 2002-45 as NOTICE 2002-71
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) for plan years beginning in October 2002.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as NOTICE 2002-68
4. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 10/15/2002 in IRB 2002-41 as REV. RUL. 2002-64
5. Revenue procedure under section 1 and other sections of the Code regarding the inflation adjusted items for 2003.
 - PUBLISHED 11/18/2002 in IRB 2002-46 as REV. PROC. 2002-70
6. Revenue procedure providing the loss payment patterns and discount factors for the 2002 accident year to be used for computing unpaid losses under section 846.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as REV. PROC. 2003-17
7. Revenue procedure providing the salvage discount factors for the 2002 accident year to be used for computing discounted estimated salvage recoverable under section 832.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as REV. PROC. 2003-18

8. Update of Rev. Proc. 2001-53 listing the tax deadlines that may be extended by the Commissioner under section 7508A in the event of a Presidentially-declared disaster or terrorist attack.
 - PUBLISHED 11/18/2002 in IRB 2002-46 as REV. PROC. 2002-71
9. Updated list of recognized tribes. (1st)
 - PUBLISHED 10/21/2002 in IRB 2002-42 as REV. PROC. 2002-64

NOVEMBER 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-74
2. Revenue ruling providing the “base period T-Bill rate” as required by section 995(f)(4).
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-68
3. Revenue ruling setting forth covered compensation tables for the 2003 calendar year for determining contributions to defined benefit plans and permitted disparity.
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-63
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) for plan years beginning in November 2002.
 - PUBLISHED 11/25/2002 in IRB 2002-47 as NOTICE 2002-74
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-77
6. Update of Rev. Proc. 2001-52 regarding adequate disclosure for purposes of the section 6662 substantial understatement penalty and the section 6694 preparer penalty.
 - PUBLISHED 10/21/2002 in IRB 2002-42 as REV. PROC. 2002-66

DECEMBER 2002

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 12/9/2002 in IRB 2002-49 as REV. RUL. 2002-81
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, 2002.
 - PUBLISHED 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-72

3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period January through March 2003.
 - PUBLISHED 12/16/2002 in IRB 2002-50 as REV. RUL. 2002-70
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) for plan years beginning in December 2002.
 - PUBLISHED 12/23/2002 in IRB 2002-51 as NOTICE 2002-80
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 12/30/2002 in IRB 2002-52 as REV. RUL. 2002-87
6. Revenue procedure setting forth, pursuant to section 1397E, the maximum face amount of Qualified Zone Academy Bonds that may be issued for each state during 2003.
 - PUBLISHED 12/9/2002 in IRB 2002-49 as REV. PROC. 2002-72

JANUARY 2003

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.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-1
2. Revenue procedure updating the procedures for furnishing technical advice to certain IRS offices, in the areas under the jurisdiction of the Chief Counsel.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-2
3. Revenue procedure updating the previously published list of “no-rule” issues under the jurisdiction of certain Associates Chief Counsel other than the Associate Chief Counsel (International) on which advance letter rulings or determination letters will not be issued.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-3
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.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-7

5. Revenue procedure updating procedures for furnishing letter rulings, general information letters, etc. in employee plans and exempt organization matters relating to sections of the Code under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-4
6. Revenue procedure updating procedures for furnishing technical advice in employee plans and exempt organization matters under the jurisdiction of the Commissioner, Tax Exempt and Government Entities Division.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-5
7. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 1/13/2003 in IRB 2003-2 as REV. RUL. 2003-5
8. Revenue ruling setting forth the prevailing state assumed interest rates provided for the determination of reserves under section 807 for contracts issued in 2002 and 2003.
 - PUBLISHED 3/10/2003 in IRB 2003-10 as REV. RUL. 2003-24
9. Revenue ruling providing the dollar amounts, increased by the 2002 inflation adjustment for section 1274A.
 - PUBLISHED 12/2/2002 in IRB 2002-48 as REV. RUL. 2002-79
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.
 - PUBLISHED 12/2/2002 in IRB 2002-48 as REV. RUL. 2002-78
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 the domestic investment yield percentages for taxable years beginning after December 31, 2001, for foreign companies conducting insurance business in the U.S.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. PROC. 2002-58
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.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-6

14. Revenue procedure updating the user fee program as it pertains to requests for letter rulings, determination letters, etc. in employee plans and exempt organizations matters under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division.
 - PUBLISHED 1/6/2003 in IRB 2003-1 as REV. PROC. 2003-8
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) for plan years beginning in January 2003.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as NOTICE 2003-7
16. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 1/27/2003 in IRB 2003-4 as REV. RUL. 2003-9

FEBRUARY 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 2/10/2003 in IRB 2003-6 as REV. RUL. 2003-16
2. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 2/24/2003 in IRB 2003-8 as REV. RUL. 2003-21
3. Revenue ruling under section 165 listing the Presidentially declared major disaster areas for the preceding calendar year.
 - PUBLISHED 3/17/2003 in IRB 2003-11 as REV. RUL. 2003-29
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) for plan years beginning in February 2003.
 - PUBLISHED 2/24/2003 in IRB 2003-8 as NOTICE 2003-14

MARCH 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 3/10/2003 in IRB 2003-10 as REV. RUL. 2003-26
2. Notice providing resident population of the states for determining the calendar year state housing credit ceiling under section 42(h), the private activity bond volume cap under section 146, and the qualified public educational facility bond volume cap under section 142(k).
 - PUBLISHED 3/10/2003 in IRB 2003-10 as NOTICE 2003-16

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, 2003.
 - PUBLISHED 2/24/2003 in IRB 2003-8 as REV. RUL. 2003-22
4. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period April through June, 2003.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as REV. RUL. 2003-30
5. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the first half of 2003 for use in valuing personal flights on employer-provided aircraft.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as REV. RUL. 2003-25
6. 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) for plan years beginning in March 2003.
 - PUBLISHED 3/24/2003 in IRB 2003-12 as NOTICE 2003-17
7. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as REV. RUL. 2003-33

APRIL 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
 - PUBLISHED 4/7/2003 in IRB 2003-14 as REV. RUL. 2003-35
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.
 - PUBLISHED 3/31/2003 in IRB 2003-13 as REV. PROC. 2003-26
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) for plan years beginning in April 2003.
 - WILL PUBLISH 4/28/2003 in IRB 2003-17 as NOTICE 2003-23

6. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

MAY 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, 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) for plan years beginning in May 2003.
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 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 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, 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, 2003.
3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period July through September 2003.
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) for plan years beginning in June 2003.
6. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

(1st) - Project was added in the first quarterly update of the 2002 - 2003 Priority Guidance Plan.

(2nd) - Project was added in the second quarterly update of the 2002 - 2003 Priority Guidance Plan.

(3rd) - Project was added in the third quarterly update of the 2002 - 2003 Priority Guidance Plan.