

Publication 1078
Issue: 04/04/2008

Section 6110 Index

Written
Determinations
Requested After
November 1, 1976

The index is arranged by Code section with various identifying subheadings. Each ruling, technical advice memorandum, and Chief Counsel advice issued under Code section 6110 is assigned a 9-digit reference number which appears after the heading to which the ruling refers. This number also appears on the ruling, technical advice memorandum, or Chief Counsel advice itself and is to be used when requesting copies of individual rulings, technical advice memoranda, or Chief Counsel advice.

The index will be cumulated on a weekly basis. A new index will be initiated each year.

Each ruling, technical advice memorandum, or Chief Counsel advice contained in this publication is directed only to the taxpayer who requested it or with respect to whom it is issued. Section 6110(k)(3) of the Internal Revenue Code provides that letter rulings, technical advice memorandums, and Chief counsel advice may not be used or cited as precedent.

Any person having questions about this publication or about section 6110 of the Code should contact the Chief, Disclosure and Litigation Support Branch,
CC:PA:LPD:DLS, Room 5201, 1111 Constitution Avenue N.W., Washington, DC 20224; (202) 622-7570.

Department of the Treasury
Internal Revenue Service

UNMATCHED TRANSACTIONS

Section 1	Tax Imposed	1.00-00
	• Maximum Capital Gains Rate 200810010	1.11-00
Section 41	Credit for Increasing Research Activities 200811020	41.00-00
Section 42	Low-Income Housing Credit 200807010 200807010	42.00-00
Section 45	Electricity Produced from Certain Renewable Sources 200805007	45.00-00
Section 59	Other Definitions and Special Rules 200812005	59.00-00
Section 61	Gross Income v. Not Gross Income 200804015 200805021 200808012 200812002 200814022	61.00-00
	• Return of Capital v. Income	61.02-00
	• <i>Court Awards, Settlements, etc.</i> 200814021	61.02-06
	• Refunds and Reimbursements	61.13-00
	• <i>Refund of Taxes or Duties</i> 200814022	61.13-07
	• Governmental Benefits and Subsidies 200810005	61.40-00
	• Recovery of Items Previously Deducted--Tax Benefit 200814019 200814020 200814021	61.44-00
	• Character of Income 200814019 200814020 200814021	61.49-00
Section 72	Annuities: Endowment and Life Insurance (Included v. Not Included in Gross Income)	72.00-00
	• Investment in Contract 200814005	72.02-00
Section 101	Certain Death Benefits (Excluded v. Not Excluded From Gross Income) 200805022	101.00-00
	• Flexible Premium Contracts Before 1985 200805022	101.05-00
Section 104	Compensation for Injuries and Sickness (Excluded v. Not Excluded) 200809011	104.00-00
	• Damages 200809001	104.03-00
Section 106	Contribution by Employer to Accident and Health Plans (Excluded v. Not Excluded) 200802003 200805006	106.00-00
Section 107	Rental Value of Parsonage (Excluded v. Not Excluded) 200803008	107.00-00
Section 108	Income From Discharge of Indebtedness	108.00-00
	• Exclusion From Gross Income 200804016	108.01-00
	• General Rules for Discharges of Indebtedness 200804016	108.04-00

Section 111	Recovery of Certain Items Previously Deducted (Excluded v. Not Excluded) 200811017 200814019 200814020 200814021	111.00-00
	• Tax Refunds 200814022	111.06-00
Section 115	Income of States, Municipalities, etc. 200802003 200807001 200807001 200808025 200811010 200814014	115.00-00
Section 141	Private Activity Bond; Qualified Bond 200813016	141.00-00
	• Private Business Tests	141.01-00
	• <i>Business Use Test</i> 200813016	141.01-01
	• Management Contracts 200813016	141.07-00
Section 146	Volume Cap 200807013 200807013	146.00-00
	• Carryforward of Allocation 200807013 200807013	146.07-00
Section 147	Other Requirements Applicable to Certain Private Activity Bonds	147.00-00
	• Restrictions and Special Rules 200813022	147.07-00
Section 148	Arbitrage 200805019	148.00-00
	• Higher Yielding Investment 200805019	148.02-00
	• Yield Determinations	148.12-00
	• <i>Adjustment for Issuance Costs</i> 200813022	148.12-01
	• <i>Adjustment for Administrative Costs</i> 200813022	148.12-02
Section 152	Dependent Defined 200812024	152.00-00
Section 162	Trade or Business (Deductible v. Not Deductible) 200804016 200804016	162.00-00
	• Certain Business Expenses	162.05-00
	• <i>Interest</i> 200801039	162.05-11
	• Million Dollar Cap - Executive Employee Compensation	162.36-00
	• <i>Performance-Based Compensation</i> 200804004	162.36-04
Section 164	Taxes 200814002 200814022	164.00-00
Section 165	Deductions For Losses 200811016	165.00-00
Section 166	Bad Debts 200814026	166.00-00

Section 167	Depreciation	167.00-00
	• Public Utility Property	167.22-00
	• <i>Normalization Rules</i> 200802025 200802026 200811004	167.22-01
Section 168	Modified Accelerated Cost Recovery System	168.00-00
	• Classification of Property 200814025	168.20-00
Section 170	Charitable, Etc. Contributions and Gifts	170.00-00
	200802024 200808028	
	• Disallowance of Deduction	170.12-00
	• <i>Partial Interests in Property</i> 200802024	170.12-03
Section 172	Net Operating Loss Deductions (Deductible v. Not Deductible)	172.00-00
	200804016 200809029	
	• Carryback and Carryover 200804016	172.01-00
	• <i>10-Year Carryover</i> 200804016	172.01-05
Section 216	Deduction Of Taxes, Interest, And Business Depreciation By Cooperative Housing Corporation Tenant-Stockholder	216.00-00
	200801038	
Section 263	Capital Expenditures (Deductible v. Not Deductible)	263.00-00
	200811021	
	• Allocation Between Capital Expenditure and Expense 200811021	263.14-00
Section 263A	Capitalization and Inclusion in Inventory Costs of Certain Expenses	263A.00-00
	• Capitalization of Costs 200811021	263A.03-00
	• <i>Indirect Costs</i> 200811021	263A.03-02
	• Allocation Methods 200811021	263A.04-00
	• Change in Method of Accounting under Section 263A 200811021	263A.07-00
Section 267	Losses, Expenses, and Interest With Respect to Transactions Between Related Parties	267.00-00
	• Special Rules Applicable to Controlled Groups: In General	267.07-00
	• <i>Deferral of Loss from Sale or Exchange Between Members</i> 200812006	267.07-02
Section 301	Distributions of Property	301.00-00
	• Dividend in Property 200808027	301.01-00
Section 302	Distributions in Redemption of Stock	302.00-00
	200810015	
Section 331	Gain or Loss to Shareholders in Corporate Liquidations	331.00-00
	200806006 200812006	

Section 332	Complete Liquidation of Subsidiaries 200807011 200807011 200812017	332.00-00
Section 337	Gain or Loss on Sale or Exchange in Connection With Certain Liquidations (UIL for Transaction Prior to 1986 Act Effective Dates)	337.00-00
	• Loss Disallowance	337.16-00
	• <i>Allowable Worthless Stock Loss</i> 200809016	337.16-02
Section 338	Certain Stock Purchases Treated as Asset Acquisitions	338.00-00
	• Express Election	338.01-00
	• <i>Time in which Election must be made</i> 200813034	338.01-02
Section 351	Transfer to Corporation Controlled by Transferor 200805009 200805010 200805011 200806006 200813027	351.00-00
	• Control v. No Control by Transferor 200813017	351.01-00
	• Series of Transactions 200805009 200813017	351.02-00
Section 355	Distribution of Stock and Securities of a Controlled Corporation 200802011 200802016 200808027 200811012 200812003 200812004 200812013	355.00-00
	• Spin-Off 200802009 200802011 200802015 200803012 200805010 200805011 200807011 200807011 200808027 200809017 200812013 200813025 200813035 200814009	355.01-00
	• <i>Split-Off</i> 200801008 200805010 200808006 200810001 200810018 200810024 200812003 200812004	355.01-01
	• Distributions Within a Consolidated Group 200812003 200812004 200812017	355.09-00
Section 362	Basis to Corporations 200808021	362.00-00
Section 367	Foreign Corporations 200813025	367.00-00
	• Transfer to Foreign Corporations Subject to Section 367(a) 200801007	367.01-00
	• Special Rules Applicable to Specified Transfers of Property Under Section 367(a)	367.04-00
	• <i>Oil and Gas Working Interests</i> 200801007	367.04-03
Section 368	Definitions Relating to Corporate Reorganizations 200804010 200812003 200812004 200812017	368.00-00
	• Statutory Merger or Consolidation (Type "A") 200804010 200805010 200812017 200813030	368.01-00
	• Assets for Control of Transferee (Type "D") 200801008 200802011 200802015 200803012 200805010 200808006 200809017 200810001 200810018 200810024 200812003 200812004 200812017 200813025 200813035 200814009	368.04-00
	• Recapitalization (Type "E") 200802011	368.05-00

	• Change in Identity, etc. (Type "F") 200802011 200802015 200803005 200803012	368.06-00
	• Continuity of Interest Rule	368.08-00
	• <i>Transfers to Controlled Corporations</i> 200802009 200805011	368.08-08
Section 382	Limitation on Net Operating Loss Carry-forwards and Built-in Losses Following Ownership Changes 200806008 200814004	382.00-00
	• Ownership Change 200810008	382.07-00
	• Operating Rules	382.12-00
	• <i>Constructive Ownership of Stock</i> 200810008	382.12-03
	• <i>Controlled Groups</i> 200807008 200807008 200807009 200807009	382.12-16
Section 402	Taxability of Beneficiary of Employee's Trust (Time and Manner of Taxation) 200806013	402.00-00
Section 408	Individual Retirement Accounts	408.00-00
	• Rollover Contributions 200802035 200804024 200804025 200804027 200806012 200806020 200808044 200814029	408.03-00
Section 409	Qualifications for Tax Credit Employee Stock Ownership Plans 200804023	409.00-00
Section 412	Minimum Funding Standards	412.00-00
	• Minimum Funding Waiver 200810032	412.06-00
Section 446	General Rule for Methods of Accounting (Permissible v. Not Permissible)	446.00-00
	• Methods of Accounting (Permissible Method v. Not Permissible)	446.03-00
	• <i>Cash</i> 200810011 200812011	446.03-01
Section 447	Method of Accounting for Corporations Engaged in Farming	447.00-00
	• Suspense Account For Family Corporation 200809029	447.06-00
Section 451	General Rule for Taxable Year of Inclusion (Year Received v. Not Year Received)	451.00-00
	• Long Term Contracts	451.16-00
	• <i>Contracts for Services</i> 200803017	451.16-02
	• Long Term Contracts	451.28-00
	• <i>Severance</i> 200803017	451.28-01
Section 453	Installment Method (Available v. Not Available) 200813032	453.00-00
	• Revocation of Elections 200813019 200813032 200814013	453.08-00

	• <i>Election After Revocation</i> 200814013	453.08-01
	• Like-Kind Exchanges 200813019	453.14-00
Section 461	General Rule for Taxable Year of Deduction (Year Paid v. Not Year Paid) 200804016	461.00-00
	• Interest	461.08-00
	• <i>Accrual Basis</i> 200801039	461.08-01
Section 468B	Special Rules For Designated Settlement Funds 200804016	468B.00-00
	• In General 200804016	468B.01-00
	• Definitions	468B.04-00
	• <i>Qualified Payment</i> 200804016	468B.04-01
Section 472	Last-In, First-Out Inventories	472.00-00
	• Election 200812010	472.01-00
Section 482	Allocation of Income and Deductions Among Taxpayers 200813028	482.00-00
Section 501	Exemption From Tax on Corporations, Certain Trusts, etc. (Exempt v. Not Exempt) 200804026	501.00-00
	• Religious, Charitable, etc., Institutions and Community Chest 200806021 200810033 200814027 200814028	501.03-00
	• <i>Employee Benefit Organization (See Also 0501.09-00)</i> 200801040 200802034 200802037 200808032 200808033 200808035 200808036 200808037 200808038 200808040 200810008 200810025	501.03-01
	• <i>Foundations</i> 200808042 200808043	501.03-02
	• <i>Homes for Aged and Related Organizations (See Also 0501.04-02)</i> 200810029	501.03-10
	• <i>Social Welfare Groups (See Also 0501.04-00)</i> 200802036	501.03-25
	• <i>Organizational and Operational Tests</i> 200802036	501.03-30
	• Business Leagues, Chambers of Commerce, Real Estate Boards, or Boards of Trade	501.06-00
	• <i>Performance of Particular Services for Members</i> 200808041	501.06-01
	• Local Benevolent Life Insurance Associations, etc.	501.12-00
	• <i>Mutual or Cooperative Electric Companies</i> 200806014 200806017 200806018	501.12-03
	• Insurance Companies or Associations With Net Written Premiums of \$350,000 Or Less 200808034 200810031	501.15-00

Section 507	Termination of Private Foundation Status 200806015 200806016 200808042 200808043 200814003	507.00-00
Section 512	Unrelated Business Taxable Income (Taxable v. Not Taxable) 200806019 200810026 200810027 200810028 200810030	512.00-00
Section 513	Unrelated v. Not Unrelated Trade or Business 200804026	513.00-00
Section 562	Dividends Eligible v. Not Eligible for Dividends-Paid Deduction • Preferential Dividends 200812016	562.00-00 562.03-00
Section 643	Definitions Applicable to Subparts A, B, C, and D 200804015 • Multiple Trusts 200806010	643.00-00 643.06-00
Section 661	Deduction for Estates and Trusts Accumulating Income or Distributing Corpus 200804015	661.00-00
Section 664	Charitable Remainder Trusts 200811003 • Definitions • <i>Charitable Remainder Unitrust</i> 200802024 200808028 200813006 200813023 200814003	664.00-00 664.03-00 664.03-02
Section 674	Power to Control Beneficial Enjoyment 200813006 200813023	674.00-00
Section 691	Recipients of Income in Respect of Decedents • Includibility of Item as Income in Respect of Decedent Generally 200803002	691.00-00 691.01-00
Section 704	Partner's Distributive Share • Partner's Interest in Partnership 200812023	704.00-00 704.02-00
Section 754	Manner of Electing Optional Adjustment to Basis of Partnership Property • Timeliness of Election 200802001 200806001	754.00-00 754.02-00
Section 817	Treatment of Variable Contracts 200811013 200811014	817.00-00
Section 831	Tax On Insurance Companies Other Than Life Insurance Companies 200811009	831.00-00
Section 848	Capitalization of Policy Acquisition Expenses 200814005	848.00-00
Section 851	Definition of Regulated Investment Company • Gross Income Requirement 200812016	851.00-00 851.02-00
Section 852	Taxation of Regulated Investment Companies and Their Shareholders • Exempt Interest Dividends 200814021	852.00-00 852.04-00
Section 856	Definition of Real Estate Investment Trust 200805002 200805017	856.00-00

	• Income Requirements 200808024	856.01-00
	• Investment Requirements 200801005 200813009	856.02-00
	• Rents From Real Property 200813005	856.04-00
	• Treatment of Wholly Owned Subsidiaries 200813003	856.07-00
Section 860D	REMIC Defined 200805001	860D.00-00
Section 864	Definitions	864.00-00
	• U.S. Trade or Business	864.01-00
	• <i>Trading in Securities</i> 200811018 200811019	864.01-04
	• Effectively Connected Income 200811018 200811019	864.02-00
	• <i>U.S. Source Interest, Dividends, etc.</i> 200811018 200811019	864.02-01
Section 884	Branch Tax	884.00-00
	• Effectively Connected Earnings and Profits 200812013	884.04-00
Section 953	Insurance Income	953.00-00
	• Election by Foreign Insurance Company to be Treated as Domestic Corporation 200809013	953.06-00
Section 985	Functional Currency 200809012	985.00-00
Section 988	Treatment of Certain Foreign Currency Transactions	988.00-00
	• Hedging Transactions 200813026	988.05-00
Section 1001	Determination of Amount of and Recognition of Gain or Loss 200802028 200804015 200804016	1001.00-00
	• Amount Realized	1001.02-00
	• <i>Property Differing Materially</i> 200806010 200812002	1001.02-07
Section 1015	Basis of Property Acquired by Gift or Transfer in Trust 200804015 200812002 200814003	1015.00-00
	• Transfer in Trust After December 31, 1920 200806010	1015.03-00
Section 1031	Exchange of Property Held for Productive Use or Investment 200807005 200807005	1031.00-00
	• Property Held For Productive Use or Investment 200812012	1031.01-00
	• Like Kind Real Estate 200805012	1031.03-00

	• Deferred Exchanges 200803003 200803014 200810016 200810017	1031.05-00
	• Multi-Party Exchanges 200810016 200810017	1031.06-00
Section 1035	Exchanges of Insurance Policies 200801001	1035.00-00
Section 1041	Transfers of Property Between Spouses or Incident to Divorce	1041.00-00
	• Transfers Incident to Divorce 200814003	1041.01-00
Section 1059	Corporate Shareholder's Basis in Stock Reduced by Non-taxed Portion of Extraordinary Dividends 200810015	1059.00-00
Section 1223	Holding Period of Capital Assets 200812002	1223.00-00
Section 1295	Qualified Electing Fund	1295.00-00
	• Time For Making Election	1295.02-00
	• <i>Retroactive Elections</i> 200814001	1295.02-02
Section 1296	Passive Foreign Investment Company	1296.00-00
	• Characterization of Income	1296.02-00
	• <i>Application of Income Look-Through Rules</i> 200813036	1296.02-02
Section 1297	Special Rules 200813036	1297.00-00
	• Exception For Corporations Changing Businesses 200813036	1297.04-00
Section 1341	Computation of Tax Where Taxpayer Restores Substantial Amount Held Under Claim of Right 200805021 200808030	1341.00-00
Section 1361	Definitions	1361.00-00
	• Small Business Corporation v. Not a Small Business Corporation	1361.01-00
	• <i>More than One Class of Stock</i> 200802002 200807004 200807004	1361.01-04
	• Certain Trusts Permitted as Shareholders 200802028	1361.03-00
	• <i>Grantor Trusts</i> 200802011	1361.03-01
	• Qualified Subchapter S Subsidiary 200804006 200809019 200811008	1361.05-00
Section 1362	Election by Small Business Corporation 200802004 200804018 200806005 200813008	1362.00-00
	• Eligible v. Ineligible 200802002 200813008	1362.01-00

	• <i>Late Elections</i>	1362.01-03
	200802005 200802013 200802014 200802017 200802018 200802019 200802020 200802022 200803011 200803015 200804005 200804017 200804018 200805003 200806009 200807007 200807007 200808019 200808026 200809005 200809018 200809021 200809030 200810009 200810014 200812014 200813008 200813018 200813020 200813029 200813031 200814012 200814015 200814017	
	• Termination of Election	1362.02-00
	200804018	
	• <i>Passive Investment Income</i>	1362.02-03
	200801037 200804008 200808004 200808016	
	• Inadvertent Terminations	1362.04-00
	200801004 200802002 200802004 200802008 200802027 200803001 200804009 200804018 200805004 200806005 200807002 200807002 200808004 200809003 200809004 200811002 200812008 200812009 200812015 200813010 200813011 200813012 200813014 200814007	
Section 1363	Effect of Election on Corporation	1363.00-00
	• Recapture of LIFO Benefits	1363.04-00
	200802011	
Section 1374	Tax Imposed On Certain Built-In Gains (for Corporations Electing S Status After 12/31/86)	1374.00-00
	200802011	
Section 1382	Taxable Income of Cooperatives	1382.00-00
	• Deductions	1382.03-00
	200806011	
Section 1502	Regulations Governing Consolidated Returns (May v. May Not File Consolidated Returns)	1502.00-00
	• Intercompany Transactions	1502.13-00
	• <i>Obligations of Members</i>	1502.13-02
	200801006	
	• Consolidated Net Operating Loss Deduction	1502.21-00
	200808002	
	• Investment Adjustment	1502.32-00
	200810015	
	• Filing Requirements	1502.75-00
	200805015 200805018 200806007	
Section 1503	Computation and Payment of Taxes	1503.00-00
	• Dual Consolidated Loss	1503.04-00
	200810023 200814018	
	• <i>Dual Resident Corporation</i>	1503.04-04
	200801002 200805014	
	• <i>Recapture</i>	1503.04-07
	200810023	
Section 1504	Definitions	1504.00-00
	200810023 200814009	
	• Includible Corporation v. Not an Includible Corporation	1504.02-00
	• <i>Foreign Subsidiary Formed to Comply With Foreign Law May Be An Includible Corporation</i>	1504.02-01
	200810023	

Section 2032A	Valuation of Farm Real Property 200804014	2032A.00-00
Section 2036	Transfers With Retained Life Estate (Included v. Not Included in Gross Estate) 200804013	2036.00-00
Section 2038	Revocable Transfers (Included v. Not Included in Gross Estate) 200804013	2038.00-00
Section 2041	Powers of Appointment (Included v. Not Included in Gross Estate) 200804013 200804015	2041.00-00
	• Pre-1942 Powers 200812022	2041.01-00
Section 2055	Transfers for Public, Charitable, and Religious Uses(Deductible v. Not Deductible) 200802010	2055.00-00
Section 2056	Bequests, etc., to Surviving Spouse (Marital Deduction v. No Marital Deduction) 200813006	2056.00-00
Section 2501	Imposition of Gift Tax (Imposed v. Not Imposed) 200804013 200812002 200814003	2501.00-00
	• Gift v. Not a Gift 200806010	2501.01-00
Section 2514	Powers of Appointment (Transfer v. Not a Transfer) 200804015	2514.00-00
Section 2518	Disclaimers 200802010	2518.00-00
Section 2519	Disposition of Certain Life Estates 200801009	2519.00-00
Section 2522	Charitable and Similar Gifts (Deductible v. Not Deductible) 200808028	2522.00-00
	• Transfer Not Exclusively for Charitable etc. Purposes	2522.02-00
	• <i>Charitable Remainder Trusts</i> 200802024	2522.02-03
Section 2523	Gift to Spouse (Marital Deduction Allowed v. Not Allowed) 200813006	2523.00-00
	• Special Rules for Charitable Remainder Trusts 200802024	2523.07-00
Section 2601	Tax On Generation Skipping Transfers 200804013 200812022 200813021	2601.00-00
	• Exceptions	2601.03-00
	• <i>Irrevocable Trusts</i> 200801011 200801012 200801013 200801014 200801015 200801016 200801017 200801018 200801019 200801020 200801021 200801022 200801023 200801024 200801025 200801026 200801027 200801028 200801029 200801030 200801031 200801032 200801033 200801034 200801035 200801036 200806010 200809023 200809024 200809025 200809026 200809027 200810019 200810020 200810021 200810022 200812018 200812019 200812020	2601.03-01
	• Transitional Rules 200812022	2601.04-00

	• <i>Wills or Revocable Trusts Executed Before October 22, 1986</i> 200804015 200812002	2601.04-01
	• <i>Amendments to Wills or Revocable Trusts</i> 200804015	2601.04-03
Section 2612	Taxable Termination; Taxable Distribution; Direct Skip	2612.00-00
	• Direct Skip Defined 200814016	2612.03-00
Section 2613	Skip Person and Non-Skip Person 200814016	2613.00-00
Section 2632	Special Rules for Allocation of GST Exemption 200813001 200814006	2632.00-00
	• Time and Manner of Allocation 200805005	2632.01-00
Section 2642	Inclusion Ratio 200801010 200802029 200813004	2642.00-00
Section 2652	Other Definitions 200805008	2652.00-00
	• Transferor Defined	2652.01-00
	• <i>Special Election for QTIP</i> 200813004	2652.01-02
Section 2654	Special Rules	2654.00-00
	• Separate Shares 200802029 200813004	2654.03-00
Section 2702	Special Valuation Rules for Transfers in Trust	2702.00-00
	• Exceptions	2702.02-00
	• <i>Personal Residence in Trust</i> 200814011	2702.02-02
Section 3121	Definitions	3121.00-00
	• Employees	3121.04-00
	• <i>Common Law Tests</i> 200813033	3121.04-01
	• Treatment of Certain Deferred Compensation and Salary Reduction Arrangements	3121.16-00
	• <i>Nonqualified Deferred Compensation Plans</i> 200813042	3121.16-02
Section 3231	Definitions	3231.00-00
	• Employers v. Not Employers 200804020 200804021 200804022 200805023 200808031 200813037 200813038 200813039 200813040 200814023	3231.01-00
Section 3301	Rate of Tax 200812001	3301.00-00
Section 3302	Credits Against Tax for Contributions to State Unemployment Funds 200812001	3302.00-00
Section 3306	Definitions	3306.00-00

	• Employees 200813033	3306.05-00
	• Not Employees Under Section 530 of 1978 Revenue Act	3306.07-00
	• <i>In General</i> 200812001	3306.07-01
Section 3401	Definitions	3401.00-00
	• Wages Subject to Withholding 200814010	3401.01-00
	• Employer-Employee Relationship	3401.04-00
	• <i>Employee v. Not an Employee</i> 200813033	3401.04-02
Section 4041	Special Fuels Tax (Taxable v. Not Taxable) 200808017	4041.00-00
	• Liability for Tax 200808017 200808018 200809031	4041.03-00
Section 4261	Transportation of Persons by Air (Taxable v. Nontaxable) 200803018	4261.00-00
Section 4940	Excise Tax on Net Investment Income (Applicable v. Not Applicable) 200806015 200806016	4940.00-00
Section 4941	Excise Taxes on Acts of Self-Dealing 200802032 200802033 200806015 200806016 200808042 200808043 200811003 200814003	4941.00-00
Section 4942	Taxes on Failure to Distribute Income 200806015 200806016	4942.00-00
Section 4944	Excise Tax on "Jeopardizing" Investments 200806015 200806016	4944.00-00
Section 4945	Excise Taxes on Taxable Expenditures 200806015 200806016 200814003	4945.00-00
Section 6015	Declaration of Estimated Income Tax by Individual (Repealed 1984) (See Also 6654.00-00) 200802030	6015.00-00
Section 6041	Information at Source 200808012	6041.00-00
	• Fixed or Determinable Gains, Profits, or Income 200809001	6041.03-00
Section 6050E	State and Local Income Tax Refunds 200814022	6050E.00-00
Section 6050P	Returns Relating to Cancellation of Indebtedness by Certain Financial Entities 200802012	6050P.00-00
Section 6324	Special Liens for Estate and Gift Tax 200803016	6324.00-00
Section 6404	Abatements	6404.00-00
	• General Rule 200802030	6404.01-00
Section 6427	Fuels Not Used for Taxable Purposes 200808017 200808018 200809031	6427.00-00

Section 6601	Interest on Underpayment, Nonpayment, or Extensions of Time for Payment of Tax (Interest v. No Interest Imposed)	6601.00-00
	• Statute of Limitations on Collection of Interest 200814024	6601.12-00
Section 7121	Closing Agreements	7121.00-00
	• Validity 200802031	7121.06-00
Section 7602	Examination of Books and Witnesses	7602.00-00
	200814008	
Section 7701	Definitions	7701.00-00
	200801003 200803004 200803007 200803009 200803010 200804001 200804002 200804003 200804019 200805013 200805020 200808011 200808020 200808029 200809002 200809006 200809007 200809008 200809009 200809014 200809015 200809020 200809021 200809022 200809028 200810003 200810004 200810006 200810007 200811001 200811005 200811006 200811011 200811015 200813007 200813013 200813015 200813024	
	• Partnerships v. Associations 200804007 200808015	7701.02-00
	• Association v. Trust 200810002 200811007	7701.03-00
	• <i>Liquidating Trusts</i> 200811007	7701.03-06
	• <i>Ordinary Trusts</i> 200807003 200807003	7701.03-08
Section 7702	Life Insurance Contract Defined	7702.00-00
	200805022 200814005	
Section 7704	Certain Publicly Traded Partnerships Treated as Corporations	7704.00-00
	• Meaning of 200803004	7704.01-00
Section 9100	Extension of Time for Making Certain Elections	9100.00-00
	200801005 200802021 200802029 200803006 200803007 200803010 200803013 200804006 200804011 200804012 200804014 200804019 200805001 200805002 200805005 200805008 200805013 200805015 200805017 200807013 200807013 200808001 200808015 200808020 200809002 200809006 200809007 200809008 200809009 200809010 200809014 200809015 200809019 200809022 200810007 200810009 200810012 200811005 200811006 200811011 200812007 200813001 200813004 200813007 200813021 200813024 200814006	
	• Section 42; Low-Income Housing Credit 200807010 200807010	9100.01-00
	• Section 146; Volume Cap 200805016 200807013 200807013	9100.03-00
	• Section 168; MACRS 200808003	9100.04-00
	• Section 338(g); Election Under Section 1.338-1T(c)(1) 200813034	9100.06-00
	• Section 442; Accounting Periods 200807012 200807012 200812021	9100.09-00
	• Section 446	9100.10-00

	• <i>Accounting Methods</i> 200810011 200812011	9100.10-01
	• Section 472; LIFO Election 200812010	9100.11-00
	• Section 754; Manner of Electing Optional Adjustment to Basis of Partnership Property 200802001 200806001 200808022 200808023	9100.15-00
	• Section 1502; Election to File Consolidated Return 200805018	9100.20-00
	• Other 200801002 200801010 200805014 200807008 200807008 200807009 200807009 200808002 200808021 200809013 200811008 200812007 200814018	9100.22-00
	• Regulation Section 1.337(d); Loss on Stock of Subsidiary 200809016	9100.29-00
	• Reg. 301.7701-3 Classification of Certain Business Entities 200801003 200802006 200802007 200803009 200803010 200804001 200804002 200804003 200804007 200805013 200805020 200807006 200807006 200808005 200808007 200808008 200808009 200808010 200808011 200808015 200808029 200809002 200809020 200809021 200809022 200809028 200810003 200810004 200810006 200811001 200811015 200813002 200813013 200813015	9100.31-00
Section 9114	Tax Conventions (See Also 894.01-00 through 894.12-00)	9114.00-00
	• U.S. Income Tax Treaties	9114.03-00
	• <i>Canada</i> 200810013	9114.03-06
Section 9999	Miscellaneous Issues	9999.00-00
	• Not Able to Identify Under Present List 200802023 200806002 200806003 200806004 200806011 200808013 200808014 200808018 200808039 200810012 200813041	9999.98-00

