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REGULATORY REPORT

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Monday, March 31, 1980

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DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Ch. I

Improving Government Regulations; Semiannual Agenda of Regulations

AGENCY: Internal Revenue Service (IRS).

ACTION: Semiannual agenda of regulations, significant and nonsignificant, under development or review.

SUMMARY: This semiannual agenda lists the regulations determined as of March 1, 1980, that the Internal Revenue Service will be developing from March 1, 1980, through September 30, 1980. The purpose of this semiannual agenda is to give the public adequate notice of Internal Revenue Service regulatory activities.

FOR FURTHER INFORMATION CONTACT: George H. Bradley, Chief, Technical Section, Legislation and Regulations Division, Office of the Chief Counsel, Internal Revenue Service, 1111 Constitution Avenue, N.W., Washington, DC 20224, Attention: CC:LR:T. 202-566-3486, not a toll-free call.

SUPPLEMENTARY INFORMATION:

General

Executive Order 12044, "Improving Government Regulations," and Treasury Directive 50-04.F, "Criteria and procedures for the Preparation, Review, and Approval of Regulations," require that a semiannual agenda of regulations under development and review be published in the *Federal Register*. In the *Federal Register* of Wednesday, November 1, 1978, it was announced that the Internal Revenue Service will publish its semiannual agenda on March 31 and September 30 of each calendar year. The next semiannual agenda of the Internal Revenue Service will be published in the *Federal Register* of Tuesday, September 30, 1980.

Description

This Semiannual Agenda of Regulations lists all projects within the Internal Revenue Service as of February 29, 1980, for the development of

regulations to appear in the Code of Federal Regulations. This agenda is divided into three parts. Part I lists existing regulations under development by the Legislation and Regulations Division, Office of the Chief Counsel. Part II lists existing regulations under development by the Employee Plans and Exempt Organizations Division, Office of the Chief Counsel. Part III lists separately projects also appearing in Part I or Part II under which existing regulations are to be reviewed pursuant to paragraph 12 of the Treasury Directive. Part IV lists the various regulation projects closed since August 31, 1979, which was the closing date with respect to which the last semiannual agenda of the Internal Revenue Service was prepared. All other projects appearing on the first semiannual agenda are reported in Parts I, II, or III, as the case may be, of this semiannual agenda. A table defining abbreviations used throughout this agenda and a second table listing attorneys (and their telephone numbers) within the Legislation and Regulations Division and the Employee Plans and Exempt Organizations Division follow Part IV. Regulations are issued under the authority contained in section 7805 of the Internal Revenue Code of 1954 (68A Stat. 917; 26 U.S.C. 7805) in order to provide necessary guidance to Internal Revenue Service personnel who administer the law and to the public who must comply with the law. Additionally, in some instances the specific sections of the Internal Revenue Code of 1954 and the sections of the act of Congress given in this agenda with respect to projects may specifically require or authorize regulations. Each of the regulation projects within each part of this agenda is listed in order by reference to the first section of the Internal Revenue Code of 1954 to which the project is in important measure addressed. The following information is disclosed in columnar form with respect to each regulation project.

1. 1954 Code Section and File Number. The first column lists sections of the Internal Revenue Code of 1954 (Code) with which the subject project is directly

concerned and the file number of the Internal Revenue Service under which the project is maintained.

2. Subject, Drafter, and Reviewer. The second column names the part of Title 26 of the Code of Federal Regulations to be amended, describes briefly the subject of the regulations, names each section of each act of Congress (if any) which gives rise to the project, and names the drafting and reviewing attorneys (in that order) within the Legislation and Regulations Division or Employee Plans and Exempt Organizations Division, Office of the Chief Counsel, who are responsible for drafting the regulation. As appropriate, the reviewing attorney within the Office of Tax Legislative Counsel or Office of International Tax Counsel, Department of the Treasury, is also named. Where a section of an act of Congress is specified in connection with a project, that project is necessary to provide regulations under the amendments to the Code made by that section of the act. In all other cases, regulations are needed under the Code sections named to provide corrective or clarifying changes in existing regulations relating to the subject matter.

3. Office in Which Pending and Status. The third column names the office or offices within the Internal Revenue Service and/or the Department of the Treasury in which the project is presently under consideration and describes the status of the project.

4. Priority and Regulatory Analysis. The fourth column discloses the relative degree of importance and necessity for publication assigned to the regulation. A priority of #1 shows that the project is of substantial importance; a priority of #2 shows that the project is of medium importance; and a priority of #3 shows that the project is of lesser importance. If a regulatory analysis is required for a project, a note to this effect and whether the regulatory analysis has been prepared appears in this column.

By direction of the Secretary of the Treasury.

Dated: March 17, 1980.

Jerome Kurtz,
Commissioner of Internal Revenue.

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part I—Regulations Under Development in the Legislation and Regulations Division			
§§ 3, 4, 144; LR-249-76	Inc. Tax—Part 1—Tax tables for individuals (§§ 208, 301 (b), (c), Rev. Act 1971; § 501, TRA 1976) (Coughlin/Saverude).	LR—in LR for prep of notice	2
§§ 11, 21; LR-33-76	Inc. Tax—Part 1—Corporate tax rates & surtax exemptions (Rev. Act 1975, § 4) (TRA 1976, § 901 (a), (e)(2)) (Murphy/Saverude).	LR—in LR for prep of notice	2
§ 37; LR-250-76	Inc. Tax—Part 1—Credit for the elderly (TRA 1976, §§ 503, 1901(c)(1)) Francis/Bromell—TLC-Flynn).	LR—2/27/80 Notice pub	2
§ 43; LR-201-76	Inc. Tax—Part 1—Earned income credit (RA 1976, §§ 103, 104, 105(a)) (Coughlin/Saverude—TLD-Roche).	Treas.—7/6/79 Notice pub; 2/29/80 T.D. to Treas. for formal approval.	2

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part I.—Regulations Under Development in the Legislation and Regulations Division—Continued			
§ 44C; LR-206-78	Inc. Tax—Part 1—Residential energy credit (Energy Tax Act 1978, § 101) (Woo/Bromell—TLC-Schuldinger/Roche).	TLC & T:C— 5/23/79 Notice pub.; 9/12/79 Hrg. held; 11/29/79 Rev. draft of T.D. to TLC & T.C.	1
§§ 46, 47; LR-92-73	Inc. Tax—Part 1—Tax treatment of mass assets for investment credit purposes (Mull/Blumkin—TLC-Cohen).	Treas.—11/15/79 Notice to Treas. for formal approval	2
§§ 46, 47, 48; LR-73-75	Inc. Tax—Part 1—Changes in investment credit (§§ 301, 302, 604, TRA 1975, Pub. L. 94-12) (Mull/Whedee—TLC-Cohen).	LR—11/30/79 Notice pub.; 6/27/79 Hrg. held in LR for prep of T.D.	2
§ 48; LR-139-76	Inc. Tax—Part 1—To conform to changes made by sec. 802, TRA, 1978, & sec. 301(a), Energy Tax Act 1978 (Mull/Blumkin—TLC-Roche).	LR—12/11/79 Notice ret'd. to LR for revision	2
§ 46 (f), (i); LR-241-74	Inc. Tax—Part 1—Retemaking treatment of certain public utility property (Lanning/Rock—TLC-Gallagher).	LR—In LR for prep of notice	2
§ 46(g); LR-248-76	Inc. Tax—Part 1—Investment credit in the case of certain ships (TRA 1976, § 805) (Thompson/Fischer—TLC-Cohen).	LR—In LR for prep of notice	3
§§ 46, 47; LR-4-76	Inc. Tax—Part 1—Investment credit for cooperatives (RA 1978, § 318) (Pub. L. 95-600) (Kissel/Rock—TLC-Shakow).	LR—In LR for prep of notice	2
§ 48; LR-228-78	Inc. Tax—Part 1—Definition of new and used sec. 38 property (Swift/Whedbee).	LR—In LR for prep of notice	2
§ 46; LR-88-79	Inc. Tax—Part 1—Single purpose agricultural structure (RA 1978, § 314) (Swift/Blumkin—TLC-Sims).	T:C—11/8/79 Draft of notice to TLC & T:C; 1/24/80 Comments from TLC.	1
§ 48(i); LR-165-77	Inc. Tax—Part 1—Definition of energy property for the business investment credit (Energy Tax Act 1978, § 301) (Mull/Blumkin—TLC-Schuldinger/Roche).	LR—11/14/80 Notice ret'd. to LR for revision	1
§ 50A, 50B; LR-200-78	Inc. Tax—Part 1—Relating to WIN credit (RA 1978, § 322) (Coughlin/Bromell—TLC-Flynn).	LR—Notice pending passage of Technical Corrections Act	2
§ 51; LR-199-78	Inc. Tax—Part 1—Amount of jobs credit (RA 1978, § 321) (Charnas/Woo—TLC-Flynn).	LR—12/28/79 Notice pub	1
§§ 56, 57, 58; LR-151-76	Inc. Tax—Part 1—Minimum tax (TRA 1976, § 301; TR&SA, § 301) (Coplan/Smith—TLC-Goodman).	LR—In LR for prep of notice	2
§ 61; LR-87-78	Inc. Tax—Part 1—Gross income—Taxation of fringe benefits (Parcell/Fischer—TLC-Krupsky).	TLC & T:—8/13/79 Draft of notice to TLC & T:!	1
§ 81; LR-194-77	Inc. Tax—Part 1—Nonqualified salary reduction agreements (Mantle/Dickinson—TLC-Sorensen).	LR—2/3/78 Notice pub.; 5/4/78 Hrg. held; 6/11/79 News Release issued soliciting further comments; 11/27/79 Hrg. held.	1
§§ 81, 182, 174, 263, 471; LR-253-78	Inc. Tax—Part 1—Prepublication expenditures of publishers (Clark/Fischer—TLC-Koppelman).	TLC—4/9/79 Draft of notice to TLC & T:C; 4/18/79 comments from T:C.	2
§ 79; LR-42-78	Inc. Tax—Part 1—Group term life insurance—Evidence of insurability (Parcell/—TLC-O'Laughlin).	LR—In LR for prep of notice	1
§ 83; LR-95-77	Inc. Tax—Part 1—Reporting requirements for non-qualified stock options (TRA 1969, § 321) (Lanning/Fischer—TLC-Sorensen).	TLC—9/20/77 Notice pub.; 3/20/78 Hrg. held; 9/24/79 Withdrawal notice to TLC & T:; 8/15/79 Comments from T:!	2
86; LR-194-78	Inc. Tax—Part 1—Unemployment compensation (RA 1978, § 112) (Schmalz/Fischer—TLC-Goodman).	LR—12/19/79 Notice pub	1
§§ 103, 81, 162, 163, 165, 171, 249, 1232; LR-70-77	Inc. Tax—Part 1—To provide for the tax consequences of refunding industrial development bonds to the issuer, bondholder & industrial user (Thompson/Mantle—TLC-Krupsky).	TLC & T:—12/8/77 Notice pub.; 3/15/78 Hrg. held; 2/8/79 2d Notice pub.; 4/13/79 Draft of T.D. to TLC & T:!	1
§ 103(b); LR-233-76	Inc. Tax—Part 1—To clarify the definition of an airport (MacMaster/Coulter—TLC-Gallagher).	Commr.—1/5/79 Notice pub.; 5/1/79 Hrg. held; 1/31/80 T.D. to Commr. for formal approval.	1
§ 103(a); LR-8-73	Inc. Tax—Part 1—To revise the definition of "on behalf of" (MacMaster/Rock—TLC-Melton).	TLC—2/2/78 Notice pub.; 4/26/78 Hrg. held; 2/20/80 Rev. draft of T.D. to TLC.	2
§ 103(b); LR-11-76	Inc. Tax—Part 1—To determine rules relating to acquisition of exempt facilities by a regional authority (MacMaster/Coulter—TLC-Koppelman).	TLC—6/28/77 Draft of notice to TLC, T:C, T:; 10/15/77 Comments from TC, 1/23/78 Comments from T:!	2
§ 103(b); LR-100-75	Inc. Tax—Part 1—To clarify the definition of property that is a solid waste disposal facility (MacMaster/Coulter—TLC-Roche).	TLC—1/18/79 Draft of notice to TLC & T:C, 3/14/79 comments from T:C.	1
§ 103(b); LR-59-74	Inc. Tax—Part 1—To define the term "Principal user of a facility" (Tolleris/Coulter—TLC-Koppelman).	TLC & T:—11/30/79 rev. draft of notice to TLC & T:!	1
§ 103(b)(6) (D) & (I); LR-117-79	Inc. Tax—Part 1—Increase in limit on small issues of industrial development bonds (RA 1978, § 331) (Mantle/Rock—TLC-Koppelman).	T:—12/19/79 Draft of notice to TLC & T:; 12/21/79 comments from TLC.	1
§ 103(b); LR-9-75	Inc. Tax—Part 1—To clarify the definition of property which is a pollution control facility (MacMaster/Coulter—TLC-Roche).	TLC—8/20/75 Notice pub.; 11/21/75 Hrg. held; 3/9/79 Draft of T.D. to TLC & T:C; 8/19/79 comments from T:C.	1
§ 103(c); LR-101-79	Inc. Tax—Part 1—To make changes to rules relating to arbitrage bonds (Marcinko/Rock).	LR—In LR for prep of notice	2
§§ 104 (a) & (b), 105(d); LR-159-76	Inc. Tax—Part 1—Changes in exclusion for sick pay & certain military etc., disability pensions; Certain disability income (TRA 1976, § 505; TR&SA, § 301) (Parcell/Fischer—TLC-O'Laughlin).	TLC & T—2/19/79 Notice fwd. for formal approval	2
§ 118(b); LR-136-76	Inc. Tax—Part 1—Contributions in aid of construction for certain utilities (TRA 1978, § 2120; TRA 1976, § 364) (Levine/Blumkin—TLC-Gallagher).	LR—5/30/78 Notice pub.; 9/27/78 Hrg. held	1
§ 124; LR-193-76	Inc. Tax—Part 1—Exclusion from gross income of value of qualified transportation provided by employer (Energy Act of 1976, § 242) (Schmalz/Fischer—TLC-Flynn).	Treas.—2/29/80 Notice to Treas. for formal approval	3

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part I.—Regulations Under Development in the Legislation and Regulations Division—Continued			
§§ 128, 1255; LR-222-78	Inc. Tax—Part 1—Exclusion from income of certain cost-sharing payments under governmental programs (RA 1978, § 543) (Mix/Fischer—TLC-Krupsky).	LR—11/26/79 Notice ret'd. to LR for revision	1
§§ 162, 62, 262, 3121, 3306, 3401; LR-173-77	Inc. Tax—Part 1—Empl. Tax—Part 31—Deductibility of certain transportation expenses (Cubeta/Saverude—TLC-Rocke).	LR—Awaiting further consideration	1
§§ 162, 4945; LR-190-77	Inc. Tax—Part 1—To provide better definitions in the area of political advertising & grass roots lobbying (Francis/Bromell—TLC-Sims).	Commr.—Awaiting consideration	1
§§ 163(d), 703(b); LR-1839	Inc. Tax—Part 1—Limitation on interest deduction (TRA 1969, § 221; RA 1971, § 304; TRA 1978, §§ 209, 901(b)(21)(F)) (Parcell/Rock—TLC-Flynn).	LR—11/28/77 Notice ret'd. to LR for revision	1
§ 166(f); LR-1173	Inc. Tax—Part 1—Deductions for additions to a reserve for certain guaranteed debt obligations (Pub. L. 96-722) (Mix/Fischer—TLC-O'Laughlin).	TLC—11/29/76 Draft of notice to TLC & T.C; 1/25/79 Comments from T.C.	3
§ 167(a); LR-107-76	Inc. Tax—Part 1—Relating to conventions for vintage accounts (Kissel/Blumkin—TLC-Cohen).	LR—11/15/79 Notice pub.; 3/27/80 Hrg. to be held	2
§ 167(c); LR-189-76	Inc. Tax—Part 1—Depreciation allowance in case of retirement of certain oil & gas boilers (Energy Tax Act 1978, § 301(e)) (Dean/Mantle—TLC-Schuldinger).	TLC & T.C—8/30/79 Rev. draft of notice to TLC & T.C.	2
§ 167(f); LR-172-79	Inc. Tax—Part 1—Ratemaking treatment of public utility property (Lanning/Rock).	LR—In LR for prep of notice	1
§ 169(d)(1)(4); LR-193-78	Inc. Tax—Part 1—Amortization of certain pollution control facilities (TRA 1976, § 2112 (b), (c)) (MacMaster/Coulter).	LR—In LR for prep of notice	2
§ 170; LR-272-76	Inc. Tax—Part 1—Charitable contributions of inventory (TRA 1978, §§ 2035, 206(c)(1), 1052(c)(2), 1307 (c), (d)(1), 1313 (b)(1), (c), 1901 (a)(28), (b)(8), 2124(e)(1)) (Murphy/Saverude—TLC-Sims).	Treas.—2/28/80 Notice to Treas. for formal approval	2
§§ 170(f)(3), 2055(e)(2), 2522(c)(2); LR-200-76	Inc. Tax—Part 1—Est. Tax—Part 20—Gift Tax—Part 25—Transfers of partial interests in property for conservation purposes (TRA 1978, § 2124(e); TR&SA, § 309) (Small/Smith—TLC-Sims).	TLC & T—9/17/79 Draft of notice to TLC & T	1
§ 175; LR-1947	Inc. Tax—Part 1—Soil & water conservation expenditures—Estate of Howard L. Strough, 55 T.C. 21 (1971) (Francis/Bromell—TLC-Melton).	LR—2/27/80 Notice pub.	2
§ 179(d)(8); LR-258-76	Inc. Tax—Part 1—Dollar limitation with respect to additional first-year depreciation allowance for small business in case of partnerships (Parcell/Fischer).	TLC—7/13/79 Draft of notice to TLC & T.C; 10/17/79 Comments from TC.	2
§ 183(e); LR-61-74	Inc. Tax—Part 1—Election to postpone application of sec. 183 (d) presumption (§ 311, RA 1971; TRA 1978, § 214) (Clark/Fischer—TLC-Flynn).	LR—9/18/75 Notice approved by Tech—New provisions to be added.	3
§ 189; LR-145-76	Inc. Tax—Part 1—Amortization and depreciation of real property construction period interest & taxes (TRA 1978, § 201) (Schmalz/Fischer—TLC-Koppelman).	TLC—3/20/79 Draft of notice to TLC & T.; 4/18/79 Comments from T.I.	1
§§ 191, 1245, 642 (f), (a)(2)(B), 1250, 57; LR-199-76	Inc. Tax—Part 1—Amortization and depreciation of certain rehabilitation expenditures for, and disallowance of deduction for amounts expended in demolishing, certain historic structures (TRA 1978, § 2124(a)-(d); RA 1978, § 701(f)) (Hartley/Saverude—TLC-Schuldinger).	Treas.—8/30/76 Notice pub.; 3/15/79 Hrg. held; 7/9/79 T.D. to Treas. for formal approval.	1
§ 192; LR-62-76	Inc. Tax—Part 1—Contributions to Black Lung Benefit (Black Lung Benefit Trust Rev. Act 1977, § 4(b)) (Stevenson/Woo—TLC-Copeland).	LR—In LR for prep of notice	2
§ 217; LR-230-76	Inc. Tax—Part 1—Moving expenses (Foreign Earned Inc. Act 1978, § 204, Pub. L. (95-617) (Coughlin/Woo—TLC-Dolan).	TLC & T.I.—1/23/80 Rev. draft of notice to TLC & T.I.	2
§ 263(c); LR-202-76	Inc. Tax—Part 1—Intangible drilling costs (Energy Tax Act 1978, § 402(a)) (Cubeta/Woo—TLC-Schuldinger).	LR—1/30/80 Notice pub.	2
§ 274(h); LR-260-76	Inc. Tax—Part 1—Deductions for attending foreign conventions (TRA 1978, § 602) (Carney/Coulter—TLC-Levinson).	LR—5/10/79 Notice ret'd. to LR for revision	2
§ 277; LR-1721	Inc. Tax—Part 1—Taxation of nonexempt membership organizations (TRA 1978, § 121(b)(3)) (Clark/Fischer).	LR—5/8/72 Notice pub.; 8/8/72 Hrg. held; 11/8/79 Rev. notice ret'd. to LR.	2
§ 280; LR-220-76	Inc. Tax—Part 1—Amortization of production cost of motion pictures, books, records, and other similar property (TRA 1978, § 210 (a), (b)) (Parcell/Fischer—TLC-Krupsky).	TLC—7/1/77 Rev. draft of notice to TLC & T.I; 2/14/76 Comments from T.I.	3
§ 280A; LR-261-76	Inc. Tax—Part 1—Deductions for expenses attributable to business use of homes, rental of vacation homes (TRA 1978, § 601) (Francis/Coulter—TLC-Flynn).	TLC & T.I.—2/7/80 Draft of notice to TLC & T.I	1
§ 303; LR-124-76	Inc. Tax—Part 1—Distributions in redemption of stock to pay death taxes (TRA 1978, § 2004(e)) (Kissel/Blumkin—TLC-Levinson).	TLC—3/3/77 Draft of notice to TLC & T.C; 5/17/77 Approved by T.C.	2
§ 305; LR-91-74	Inc. Tax—Part 1—To clarify meaning of term "reasonable redemption premium" (Kissel/Blumkin—TLC-Cohen).	LR—5/22/79 Notice ret'd. to LR for revision	2
§ 337; LR-227-76	Inc. Tax—Part 1—60-day extension of 12-month period if there is an involuntary conversion (Pub. L. 95-628) (Axelrod/Blumkin—TLC-Krupsky).	LR—1/30/80 Notice pub.	2

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part I.—Regulations Under Development in the Legislation and Regulations Division—Continued</i>			
§ 337; LR-130-76	Inc. Tax—Part 1—Simultaneous liquidation of a parent and subsidiary (TRA 1976, §§ 2118, 1901(a)) (Swift/Wheedbee—TLC-Krupsky).	LR—In LR for prep of notice	2
§ 351; LR-754	Inc. Tax—Part 1—Transfer by a cash basis taxpayer of unrealized accounts receivable, etc., to a corp. controlled by the transferee (Yecies/Blumkin—TLC-Cohen).	LR—12/7/77 Draft of notice ret'd. to LR for revision	2
§§ 351, 368; LR-1993	Inc. Tax—Part 1—Basis in stock of a corp. acquiring property in exchange for stock of corp. in control of acquiring corp. (Levine/Blumkin—TLC-Cohen).	LR—4/13/78 Notice ret'd. to LR for revision	1
§ 355; LR-936	Inc. Tax—Part 1—Distribution of stock and securities of a controlled corp. (Yecies/Blumkin—TLC-Cohen).	LR—1/13/77 Notice pub.; 1/21/77 Notice repub. in LR for prep of T.D.	1
§ 367; LR-2-78	Inc. Tax—Part 1—Changes in ruling requirements under sec. 367 (other than subsec. (a)(2) (TRA 1978, § 1042(a))) (Horowitz/Felton—ITC-Dolan).	LR—12/30/77 Notice pub. under LR-230-76; 10/5/79 Temp. Regs. pub. T.D. 7646; 10/5/79 Notice pub.; 2/27/80 Hrg. held.	1
§ 367(a)(2); LR-231-78	Inc. Tax—Part 1—Exception for transfers of property from the U.S. designated by the Secretary (TRA 1976, § 1042(a)) (Dean/Felton—ITC-Hannes).	LR—In LR for prep of notice	1
§§ 368(a)(2)(F), 721, 722, 723, 683; LR-135-76	Inc. Tax—Part 1—Exchange funds (TRA 1976, § 2131) (Mull/Blumkin—TLC-Rabinowitz/Krupsky).	TLC & T:C—12/10/79 Rev. draft of notice to TLC & T:C	1
§ 368 (a)(2)(E), (b)(2); LR-1994	Inc. Tax—Part 1—Acquisition of a corp. by merger of a corp. controlled by the acquiring corp. (Pub. L. 91-693) (Levine/Blumkin—TLC-Cohen).	TLC & T:C—2/14/80 Notice fwd. for formal approval	1
§ 368; LR-93-79	Inc. Tax—Part 1—Clarification of continuity of business enterprise requirement for corporate reorgs. (Mull/Blumkin—TLC-Cohen).	LR—12/28/78 Notice pub.; 3/18/80 Hrg. to be held	1
§ 385; LR-1661	Inc. Tax—Part 1—Treatment of certain corporate interests as stock or indebtedness (§ 415, TRA 1969) (Levine/Blumkin—TLC-Cohen).	Commr.—2/22/80 Notice to Commr. for formal approval	1
§ 414 (b), (c); LR-209-74	Inc. Tax—Part 1—Definitions and special rules (Pub. L. 93-406, § 1015) (Yecies/Blumkin—TLC-Sorensen).	TLC & EP—11/5/75 Notice pub.; 11/19/79 Rev. draft of T.D. to TLC & EP.	3
§ 414(e); LR-193-74	Inc. Tax—Part 1—Definition of church plans (Pub. L. 93-406, § 1015) (Mix/Fischer—TLC-Melton).	Treas.—4/8/77 Notice pub.; 10/6/77 Hrg. held; 1/29/80 T.D. to Treas. for formal approval.	2
§ 447; LR-143-76	Inc. Tax—Part 1—Method of accounting for corps. engaged in farming (TRA 1978, § 207(c)) (Clark/Fischer—TLC-Melton).	TLC—5/18/78 Draft of notice to TLC & T:C; 6/26/78 Comments from T.C.	1
§ 453; LR-32-75	Inc. Tax—Part 1—Adoption of installment method of reporting by dealers of personal property (Mix/Fischer—TLC-Brown).	LR—In LR for prep of notice	3
§ 453; LR-835	Inc. Tax—Part 1—Election to adopt installment method of reporting income from sale of real property or casual sale of personal property (Mix/Fischer—TLC-Brown).	LR—3/21/78 Notice ret'd. to LR for revision	3
§ 458; LR-195-76	Inc. Tax—Part 1—Exclusion from gross income with respect to magazines, paperbacks, and records returned after close of taxable year (RA 1978, § 372) (Schmalz/Fischer).	LR—In LR for prep of notice	2
§ 481; LR-190-76	Inc. Tax—Part 1—Treatment of prepaid interest (TRA 1978, §§ 208, 1901(a)(89)) (Parcell/Fischer—TLC-Sims).	TLC—10/23/79 Rev. draft of notice to TLC & T:i; 12/20/79 Approved by T:i.	2
§§ 463, 81; LR-8-75	Inc. Tax—Part 1—Accrual of vacation pay (Pub. L. 93-625) (Clark/Fischer—TLC-Brown).	TLC—3/26/76 Rev. draft of notice to TLC & T:C; 4/19/76 Comments from T:C.	1
§§ 464, 278(b); LR-144-76	Inc. Tax—Part 1—Limitation on deductions in case of farming syndicates (TRA 1976, § 207 (a), (b)) (Clark/Fischer—TLC-Melton).	TLC—11/7/78 Rev. draft of notice to TLC & T:i; 11/22/78 Comments from T:i.	1
§ 465; LR-168-76	Inc. Tax—Part 1—Determination of amounts at risk with respect to certain activities (TRA 1978, § 204) (Clark/Fischer—TLC-Levinson).	TLC—6/5/79 Notice pub.; 9/27/79 Hrg. held; 11/7/79 Draft of T.D. to TLC & T:i; 12/28/79 Comments from T:i.	1
§ 471; LR-2158	Inc. Tax—Part 1—Inventories at cost or market, whichever is lower (Schmalz/Fischer—TLC-Brown).	TLC—6/1/77 Final draft of notice to TLC	2
§ 472; LR-84-77	Inc. Tax—Part 1—Conformity requirement incident to use of LIFO inventory method; Use of market value (Lanning/Fischer—TLC-Brown).	TLC & T:C—7/20/79 Notice pub.; 11/16/79 Draft of T.D. to TLC & T:C.	1
§ 482; LR-307-76	Inc. Tax—Part 1—Allocation of income & deductions among T/P's to revise percentage applied in determining rental charge for use of tangible property to reflect amendt. of regs. to provide for a "safe haven" imputed interest rate of 6-8 percent (Schreiner/Felton—ITC-Langbein).	LR—1/19/79 Notice ret'd. to LR by CC/LS for rev.	2
§§ 482, 483; LR-171-79	Inc. Tax—Part 6—Temp. Regs.—Imputed interest rates (Rood/Fischer—ITC-Langbein).	ITC—9/27/79 Draft of T.D. to ITC & T:C; 11/20/79 Comments from TC.	1
§§ 664, 170A, 25.2522; LR-42-73	Inc. Tax—Part 1—To provide rules for application of charitable remainder trust provisions to certain living trusts (Coughlin/Woo—TLC-Goodman).	TLC & T:i—11/16/79 Draft of notice to TLC & T:i	3
§§ 667, 666(e), 668, 665 (b), (e)-(g), 669, 1302 (a)(2)(B), (b)(2)(B), 6401(b); LR-184-76	Inc. Tax—Part 1—Proc. & Admin.—Part 301—Accumulation trusts (TRA 1978, §§ 701 (a)-(d), (f), 1014) (Hartley/Smith—TLC-Sorensen).	LR—In LR for prep of notice	2
§§ 679, 678(b), 643(a)(c) (C), (D), (d), 6048, 6677; LR-187-76	Inc. Tax—Part 1—Proc. & Admin.—Part 301—Foreign trusts having U.S. beneficiaries (TRA 1976, § 1013) (Kusma/Smith—ITC-Langbein).	ITC & T:i—11/7/79 Rev. draft of notice to ITC & T:i	1
§ 704(b); LR-282-76	Inc. Tax—Part 1—Determination of partner's distributive share (TRA 1976, § 213(d)) (Cubeta/Bromell—TLC-Levinson/Koppelman).	TLC & T:i—11/30/78 Draft of notice to TLC & T:i	1

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part I—Regulations Under Development in the Legislation and Regulations Division—Continued</i>			
§§ 706(c)(2)(B), 704; LR-265-76	Inc. Tax—Part 1—Items allocated to portion of year partner held interest (TRA 1976, § 213(c)) (Francis/Bromell—TLC-Levinson/Koppelman).	TLC—3/27/79 Draft of notice to TLC	1
§ 707(c); LR-2127	Inc. Tax—Part 1—To conform the income tax regs. relating to guaranteed payments to partners to sec. 213(b)(3) of TRA 1976 and to the Miller & Carey decisions (Francis/Bromell—TLC-Levinson/Koppelman).	TLC—3/12/76 Draft of notice to TLC & T; 4/22/76 Comments from T:1.	1
§ 709; LR-266-76	Inc. Tax—Part 1—Clarification of treatment of partnership syndication fees, etc. (TRA 1976, § 213(b)) (Coughlin/Bromell—TLC-Koppelman).	LR—1/11/80 Notice pub.	2
§§ 656-660, 172 (b), (d), 316(b), 381(c)(25), 443(e)(5), 4981, 6161(b), 6211-6213(a), 6214, 6344(a), 6422, 6503(f), 6512, 6515, 6801(c), 6897, 7422; LR-218-76.	Inc. Tax—Part 1—Real Estate Investment trusts (TRA 1976, §§ 1601-1606, 1901 (a), (b), 1906 (a), (f)) (Pub. L. 93-825, § 6) (Whedbee/Blumkin—TLC-Levinson).	TLC—7/7/76 Notice pub.; 12/20/76 Hrg. held; 5/14/79 Draft of T.D. to TLC & T:FP; 6/25/79 Comments from T; 11/6/79 Chngd. pages to TLC.	2
§ 860; LR-183-78	Inc. Tax—Part 1—Real estate investment trusts & regulated investment companies (RA 1978, § 362) (Whedbee/Blumkin—TLC-Levinson).	Commr—2/12/80 Notice to Commr. for formal approval	2
§ 861(a)(1)(B); LR-173-75	Inc. Tax—Part 1—To determine source of interest on court judgments, source of commitment fees & acceptance fees, & application of § 861 to interest paid by certain domestic corps.—Amndt. of § 1.86-4 to determine application of payroll cost method (Renfroe/Felton—ITC-Langbein).	LR—6/2/78 Notice ret'd. to LR for revision	2
§ 861(a)(1)(H); LR-41-75	Inc. Tax—Part 1—Subch. N—As added by sec. 9(a) of Pub. L. 93-825, with respect to source of interest of certain debt obligations (Renfroe/Felton—ITC-Dolan).	LR—in LR for prep of notice	3
§ 861(a)(7); LR-71-77	Inc. Tax—Part 1—Source of income of underwriting income (TRA 1976, § 1036) (Feldman/Felton—ITC-Dolan).	LR—in LR for prep of notice	2
§ 861(a); LR-215-78	Inc. Tax—Part 1—Computation of taxable income from sources within and without the U.S. (Duffy/Severude—ITC-Langbein).	ITC—6/26/79 Draft of notice to ITC & T:C; 7/19/79 Comments from T:C.	1 Regulatory analysis required; not prepared as yet.
§ 861-8; LR-86-79	Inc. Tax—Part 1—Allowance & Apportionment of interest expense of foreign corps. (Bouma/Severude).	LR—2/27/80 Notice pub.	1 Required draft regulatory analysis has been prepared.
§§ 671, 681, 1441, 1442; LR-2043	Inc. Tax—Part 1—Original issue discount (RA 1971, § 313) (Schreiner/Rock—ITC-Langbein).	LR—7/12/76 Notice pub.; 11/18/76 Hrg. held; 4/20/79 T.D. ret'd. to LR with comments.	1
§§ 892, 893, 895, 47,4362; LR-106-75	Inc. Tax—Part 1—Exemption of income of foreign gov'ts., employees of foreign gov'ts employees of foreign gov'ts. & foreign central banks of issue, and exemption from tax on issuance of certificates of indebtedness issued by any foreign government (Duffy/Felton—ITC-Hannes).	Treas.—8/15/78 Notice pub.; 1/23/79 Hrg. held; 11/8/79 T.D. to Treas. for formal approval; 2/22/80 Revised pages to Treas.	1
§§ 901, 903; LR-100-76	Inc. Tax—Part 1—To provide rules setting forth requirements for creditable foreign taxes (Horowitz/Felton—ITC-Hannes).	ITC & T:C—6/20/79 Notice pub.; 10/11/79 Hrg. held; 11/28/79 Draft of T.D. to ITC & T:C; 1/15/80 Draft of new notice to ITC & T:C.	1
§ 901(f); LR-65-75	Inc. Tax—Part 1—Certain payments for oil or gas not to be considered as taxes (§§ 275(a), 901, 601(b), TRA 1975, Pub. L. 94-12) (Duffy/Blumkin—ITC-Hannes).	Treas.—11/28/79 Notice to Treas. for formal approval	1
§ 902; LR-196-75	Inc. Tax—Part 1—To clarify rules for determining earnings & profits of a foreign corp. & amount of creditable foreign taxes (Schreiner/Felton—ITC-Hannes).	ITC—4/7/78 Draft of notice to ITC & T:C; 4/28/78 Comments from T:C.	1
§ 904(b)(2) & (3); LR-228-76	Inc. Tax—Part 1—Limitation on, and treatment of, capital gains for purposes of foreign tax credit (TRA 1976, §§ 1031, 1034; RA 1978, §§ 403(c)(4), 701(u) (2) & (3)) (Feldman/Rock—ITC-Dolan).	ITC—10/25/79 Draft of notice to ITC & T:C; 12/18/79 Comments from TC.	1
§ 904(e); LR-11-77	Inc. Tax—Part 1—Transitional rules for carrybacks & carryovers of foreign tax credits as a result of repeal of per-country limitation by sec. 1031(a), TRA 1976 (Renfroe/Felton—ITC-Dolan).	LR—in LR for prep of notice	2
§ 904(f); LR-3-77	Inc. Tax—Part 1—Recapture of foreign losses (TRA 1976, § 1032) (Renfroe/Felton—ITC-Hannes).	LR—in LR for prep of notice	1
§ 907; LR-70-75	Inc. Tax—Part 1—Limitation dealing with foreign tax credit for taxes paid in connection with foreign oil & gas income (§ 801, TRA 1975; § 1035, TRA 1976) (Duffy/Blumkin—ITC-Hannes).	Treas.—5/8/79 Notice to Treas. for formal approval	1
§§ 911, 913; LR-2-79	Inc. Tax—Part 1—Treatment of foreign earned income derived by U.S. citizens & residents (Foreign Earned Income Act 1978, §§ 4, 202, 203) (Dean/Felton—ITC-Dolan).	LR—5/9/79 Notice pub.; 6/28/79 Hrg. held in LR for prep of T.D.	1
§§ 936, 33, 931, 901 (d), (g), 904 (b), 243(b)(1), 248, 1504(b)(4), 48(a)(2)(B), 116(b)(2), 861(a)(2)(A), 6091(b)(2); LR-247-76.	Inc. Tax—Part 1—Tax treatment of corps. conducting a trade or business in Puerto Rico & possession of the U.S. (TRA 1976, § 1051) (Bouknight/Felton—ITC-Langbein).	LR—in LR for prep of notice	1
§ 936(d)(2); LR-106-77	Inc. Tax—Part 1—Definition of qualified possession source investment income for purposes of Puerto Rican & possession tax credit (TRA 1969, § 1051) (Horowitz/Felton—ITC-Langbein).	LR—1/21/80 Notice ret'd. to LR for revision	2

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part I.—Regulations Under Development in the Legislation and Regulations Division—Continued			
§§ 951, 954, 955; LR-68-75	Inc. Tax—Part 1—Current taxation of shipping profits of controlled foreign corps. except to extent such profits are reinvested in shipping operations (§ 802(d), TRA 1975; TRA 1976, § 1024) (Klein/Saverude—ITC-Fogaras).	ITC—8/9/78 Notice pub.; 8/22/77 Temp. Regs. T.D. 7503 published 5/16/79 Draft of T.D. to ITC & T.C.; 7/19/79 Comments from T.C.	2
§§ 951(a), 954 (b)(1), (f), 955; LR-67-75	Inc. Tax—Part 1—Conforming regs. to certain amendments to subpart F (§ 802(a)(3) (B) & (c) (other than (c)(6)), TRA 1975, Pub. L. 94-12) (Klein/Saverude—ITC-Fogaras).	LR—2/9/78 Notice pub. in LR for prep of T.D.	2
§§ 952, 995, 964; LR-234-76	Inc. Tax—Part 1—Denial of certain tax benefits in connection with the payment of certain bribes (TRA 1976, §§ 1065, 1066(b)) (Bouknight/Felton—ITC-Dolan).	ITC—1/16/80 Draft of notice to ITC & T.C.; 2/20/80 Comments from T.C.	3
§ 954(c)(3)(C); LR-226-76	Inc. Tax—Part 1—Exclusion from subpart F of certain earnings of insurance companies (TRA 1976, § 1023) (Duffy/Saverude—ITC-Dolan).	LR—4/23/79 Notice pub.; 10/19/79 in LR for prep. of final draft of T.D.	2
§§ 956(d)(2), 958(b); LR-227-76	Inc. Tax—Part 1—Investment in U.S. property by controlled foreign corporation; clarification of term "pledge or guarantee" (TRA 1976, § 1021) (Feldman/Felton—ITC-Dolan).	LR—4/23/79 Notice pub.; 10/30/79 Hrg. held.	1
§ 960(a)(1); LR-237-76	Inc. Tax—Part 1—Third tier foreign tax credit when sec. 951 applies (TRA 1976, § 1037) (Renfro/Felton—ITC-Dolan).	ITC—7/12/79 Draft of notice to ITC & T.C.; 9/25/79 Comments from T.C.	3
§§ 993 (c)(2), (d), 995(c), 751(c), 996(a)(2); LR-245-76	Inc. Tax—Part 1—Misc. DISC amdmnts. (TRA 1976, § 1101 (c), (e), & (g)(1)-(4)) (Bouma/Felton—ITC-Langbein).	LR—in LR for prep of notice.	2
§ 993; LR-92-77	Inc. Tax—Part 1—DISC—Definition of trade receivable (Act of 1971, § 501) (Feldman-Felton—ITC-Langbein).	Commr.—10/5/79 Notice to Commr. for formal approval.	2
§ 995; LR-246-76	Inc. Tax—Part 1—Amdmts. affecting DISC pertaining to military sales & incremental export gross receipts (TRA 1976, § 1101 (a), (g)(1), & (5)) (Feldman/Felton—ITC-Langbein).	LR—1/14/80 Notice ret'd. to LR for revision.	1
§§ 999, 908, 952(a), 995(b)(1); LR-235-76	Inc. Tax—Part 1—Denial of certain tax benefits for cooperation with or participation in international boycotts (TRA 1976, §§ 1061-1064, 1066(a), 1067) (Schreiner/Felton—ITC-Dolan).	LR—in LR for prep of notice.	3
§ 1001; LR-52-79	Inc. Tax—Part 1—Discharge of liabilities on the sale or other disposition of property (Parcell/Fisher—TLC-Cohen).	LR—12/26/79 Notice pub.	1
§ 1001; LR-165-79	Inc. Tax—Part 1—Taxpayer who owns property subject to certain types of indebtedness realizes income at death (Small/Smith—TLC-Koppelman).	TLC & T—9/25/79 Notice fwd. for formal approval.	2
§§ 1014(d), 1023, 1016(a)(23), 691(c)(2) (A), (C), 1246; LR-196-76	Inc. Tax—Part 1—Carryover basis (TRA 1976, § 2005(a)) (Small/Smith—TLC-Sorensen).	TLC—5/3/78 Draft of notice to TLC & T.; 8/19/78 Comments from T.C.	2
§ 1033(g)(3); LR-268-76	Inc. Tax—Part 1—Election to treat outdoor advertising displays as real property (TRA 1976, § 2127) (Chamas/Bromell—TLC-Flynn).	LR—12/11/79 Notice pub.	2
§§ 1040, 1015(d)(6); LR-214-76	Inc. Tax—Part 1—Various rules relating to carryover basis (TRA 1976, § 2005 (b), (c)) (Kusman/Smith—TLC-Sorensen).	LR—in LR for prep of notice.	2
§§ 1056, 1245; LR-222-76	Inc. Tax—Part 1—Basis limitation & recapture of depreciation on player contracts (TRA 1976, §§ 212 (a), (b), 1901(b)(11)(D), 1951(c)(2)(C), 2122(b)(3), 2124(a)(2)) (Schmalz/Fischer—TLC-Krupsky).	LR—Notice ret'd. to LR for revision.	3
§§ 1101, 1102, 1103, 311, 6151, 6158, 6503, 6601; LR-268-76	Inc. Tax—Part 1—Divestures of assets by bank holding companies (Pub. L. 94-453) (Levine/Blumkin—TLC-Koppelman).	TLC—12/27/78 Draft of notice to TLC & T.; 3/27/79 Comments from T.C.	3
§ 1222; LR-273-76	Inc. Tax—Part 1—Increase in holding period required for capital gain or loss to be long term (TRA 1976, §§ 1402, 1901(a)(136)) (Ausness/Mantle—TLC-Flynn).	Treas.—1/29/80 Notice to Treas. for formal approval.	2
§ 1244; LR-186-76	Inc. Tax—Part 1—Liberalization of rule relating to losses on small business stock (Rev. Act of 1976, § 345) (Thompson/Coulter—TLC-Krupsky).	TLC & T.C.—9/19/79 Notice pub.; 11/30/79 Draft of T.D. to TLC & T.C.	2
§§ 1246, 751; LR-232-76	Inc. Tax—Part 1—Gain from sale or exchange of stock in foreign corps. (TRA 1976, §§ 1022, 1042 (b), (c)) (Horowitz/Saverude—ITC-Hannes).	ITC—10/11/79 Final draft of notice to ITC & T.C.; 10/25/79 Comments from T.C.	1
§ 1250; LR-131-76	Inc. Tax—Part 1—Recapture of depreciation on real property (TRA 1976, §§ 202, 1901(b), 1951(e), 2122(b), 2124(a)) (Marcinko/Rock).	LR—in LR for prep of notice.	3
§ 1253; LR-1644	Inc. Tax—Part 1—Transfer of franchises; trademarks and trade names (TRA 1969, § 516(c)) (Tolleris/Coulter—TLC-Levenson).	TLC—7/15/71 Notice pub.; 4/10/79 Draft of Rev. notice to TLC & T.C.; 5/11/79 Comments from T.C.	2
§§ 1254, 751(c); LR-276-76	Inc. Tax—Part 1—Gain from disposition of interest in oil or gas property (TRA 1976, §§ 205, 1901(a)(93)) (Mantle/Saverude—TLC-Schuldinger).	Commr.—2/27/80 Notice to Treas. for formal approval.	2
§ 1348; LR-156-76	Inc. Tax—Part 1—Maximum tax on personal service income (TRA 1976, § 302) (Lanning/Dickinson—TLC-O'Laughlin).	LR—5/10/77 Notice ret'd. to LR for revision.	2
§ 1371; LR-4-73	Inc. Tax—Part 1—Treatment of obligations which purport to represent debt as a second class of stock (Woo/Saverude—TLC-Cohen).	LR—11/11/76 Rev. draft of notice to TLC & T.; 12/14/76 Comments from T.C.; 11/29/76 Comments from T.C.	2
§§ 1371, 1372; LR-277-76	Inc. Tax—Part 1—Certain rules relating to shareholders of subchapter S corporations (TRA 1976, §§ 902 (a) & (c); 1901(a)(149)) (Murphy/Saverude—TLC-Cohen).	Commr.—1/9/80 Notice to Commr. for formal approval.	2

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part I—Regulations Under Development in the Legislation and Regulations Division—Continued</i>			
§§ 1385, 1388; LR-1175	Inc. Tax—Part 1—Relating to tax treatment of per unit retain allocations (Pub. L. 89-809, § 211) (Parcell/Fischer—TLC-Schuldinger).	TLC—4/11/74 Draft of notice to TLC & T.C; 1/26/76 Comments from T.C.	3
§ 1441; LR-165-76	Inc. Tax—Part 1—Personal services income of nonresident individuals (Klein/Felton—ITC-Fogars).	LR—In LR for prep of notice	2
§ 1441; LR-2139	Inc. Tax—Part 1—Withholding of income tax on payments to Virgin Islands inhabitants (Bouknight/Felton—ITC-Langbein).	ITC & T.C—1/16/80 Final draft of notice to ITC & T.C	1
§§ 1491, 1057; LR-236-76	Inc. Tax—Part 1—Excise tax on transfers of property to foreign persons to avoid the Federal Income tax (TRA 1976, § 1015) (Klein/Felton—ITC-Langbein).	ITC—9/9/77 Rev. draft of notice to ITC & T.C; 7/25/78 Comments from T.C.	1
§ 1502; LR-75-79	Inc. Tax—Part 1—At risk limitations of sec. 465 (Axelrod/Blumkin—TLC-Cohen).	TLC & T.C—12/27/79 Rev. draft of notice to TLC & T.C	1
§ 1502; LR-1068	Inc. Tax—Part 1—Revision of regs. under sec. 1502 re personal holding companies (Whedbee/Blumkin—TLC-Brown/Cohen).	LR—7/5/79 Notice ret'd. to LR for revision	2
§ 1502; LR-140-73	Inc. Tax—Part 1—Misc. & Tech. amdmts to consolidated return regs. (Axelrod/Blumkin—TLC-Brown/Cohen).	LR—3/21/76 Notice ret'd. to LR for revision	2
§ 1502; LR-97-79	Inc. Tax—Part 1—Credit & deductions, etc. for consolidated returns (Axelrod/Blumkin).	LR—In LR for prep of notice	2
§ 1502; LR-45-76	Inc. Tax—Part 1—To provide rules for consolidated application of sec. 613A of the Code re limitations on percentage depletion in the case of oil & gas wells (TRA 1975, § 501) (Axelrod/Blumkin—TLC-Cohen/Brown).	Commr.—12/27/79 Notice to Commr. for formal approval	2
§ 1502; LR-94-74	Inc. Tax—Part 1—to provide consolidated return rules relating to life insurance cos. subject to tax under subch. L (Duffy/Blumkin—Sims/Brown/Cohen).	LR—In LR for prep of notice	1
§ 1502; LR-1386	Inc. Tax—Part 1—Consolidated return regs.—Revision of regs. under sec. 1502 re accumulated earnings tax (Whedbee/Blumkin—TLC-Cohen/Brown).	TLC—7/9/68 Notice pub.; 9/12/68 Hrg. held; 6/25/71 Notice withdrawn; 5/14/79 Rev. notice pub.; 10/3/79 Hrg. held; 11/30/79 Drafts of new notice & TD to TLC & T.C; 12/14/79 Approved by T.C.	3
§ 1502; LR-113-77	Inc. Tax—Part 1—Consolidated return regs.—Investment adjustments (Axelrod/Blumkin—TLC-Cohen/Brown).	LR—In LR for prep of notice	2
§ 1502; LR-256-79	Inc. Tax—Part 1—Consolidated return/Accumulated earnings tax—Earnings & profits when personal holding co. is a member (Whedbee-Blumkin).	TLC & T.C—12/26/79 Draft of notice to TLC & T.C	2
§ 1502; LR-29-76	Inc. Tax—Part 1—Reflect amdmts. of consolidated return regs. to reflect Merchant Marine Act of 1970 concerning Merchant Marine & Fisheries Capital Construction Funds (Axelrod/Blumkin—TLC-Cohen).	LR—In LR for prep of notice	2
§ 1504(d); LR-189-77	Inc. Tax—Part 1—Includibility in an affiliated group of subsidiaries formed to comply with foreign laws (Swift/Blumkin—ITC-Langebein).	LR—1/17/79 Notice ret'd. to LR for revision	1
§§ 2001, 2010, 2012 (a), (e), 2052, 2035, 2502, 2505, 2521, 2011, 2013 (b), (e)(1), 2101, 2102, 2106(a)(3), 2014(b)(2), 2206, 2207, 6016, 2038(a), 2104, 2004, 2504; LR-212-76	Est. & Gift Taxes—Parts 20 & 25—Unified rate schedule for estate & gift taxes and unified credit in lieu of exemptions (TRA 1976, § 2001) (Grundeman/Smith—TLC-O'Laughlin).	ITC & T.C—11/30/79 Draft of notice to ITC & T.C	2
§ 2031; LR-164-79	Est. Tax—Part 20—Valuation of self-created art in an artist's estate (Coplan/Smith—TLC-Sims).	TLC & T—2/1/80 Draft of notice to TLC & T	1
§§ 2032A, 6166 (d), (e), (f), (h), 6324A (a), (c) 6601(j), 2013(f); LR-203-76	Est. Tax—Part 20—Various estate tax elections & valuation of certain farm, etc., real property (TRA 1976, §§ 2003 (a), (c), 2004 (a), (b), (d)) (RA 1976, § 702(d)) (Hartley/Smith—TLC-Melton).	LR—7/13/78 Notice pub. [Part I]; 7/19/78 Notice pub. [Part II]; 12/21/78 Notice pub. [Part III]; 4/3/79 Hrg. held; 9/10/79 Notice pub. [Part IV]; 9/10/79 Withdrawal Notice Pub. [1 para. of Part II]; 9/20/79 Draft of T.D. [Parts I, II, & III], ret'd. to LR for prep. of final T.D.; 1/16/80 Hrg. held [Part IV].	1
§ 2038(a); LR-161-76	Est. & Gift Taxes—Parts 20 & 25—Inclusion of stock in estate where decedent retained voting rights (TRA 1976; RA 1976, § 702(f)) (Harman-Smith—TLC-O'Laughlin).	LR—In LR for prep of notice	1
§ 2040; LR-180-76	Est. Tax—Part 20—Fractional interest of spouse (TRA 1976, § 2002 (c), (d)(3)) (Small/Grundeman—TLC-O'Laughlin).	LR—In LR for prep of notice	1
§ 2040(d); LR-16-79	Est. Tax—Part 23—Temp. Regs.—Election to treat certain jointly held property as qualified joint interest (RA 1976, § 702 (k)) (Small/Grundeman—TLC-O'Laughlin).	Treas.—2/29/80 T.D. to Treas. for formal approval	2
§ 2055(e); LR-259-74	Est. Tax—Part 20—Disallowance of charitable deduction—Extension of time within which to amend governing instruments in order to qualify as a charitable remainder annuity trust, unitrust, or pooled income fund (Pub. L. 93-483, § 3) (Grundeman/Rock—TLC-O'Laughlin).	TLC & T—12/19/75 Notice pub.; 3/30/76 Hrg. held; 11/26/79 Draft of T.D. to TLC & T.	2
§§ 2056(c)(1), 2523(a); LR-211-76	Est. & Gift Taxes—Parts 20 & 25—Increase in limitations on marital deductions (TRA 1976, § 2002 (a), (b), (d) (1), (2)) (Harman/Rock—TLC-O'Laughlin).	LR—In LR for prep of notice	3
§ 2057; LR-182-76	Est. Tax—Part 20—Deduction for bequests to certain minor children (TRA 1976, § 2007) (Alexander/Smith—TLC-O'Laughlin).	LR—In LR for prep of notice	1
§§ 2516, 2045, 2041(a)(2), 2055(a), 2056, 2504(b); LR-213-76	Est. & Gift Taxes—Parts 20 & 25—Disclaimers (TRA 1976, § 2009 (b)) (RA 1976, § 702(m)) (Kusma/Smith—TLC-Rabinowitz).	TLC & T—2/25/80 Final draft of notice to TLC & T	1

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part I—Regulations Under Development in the Legislation and Regulations Division—Continued</i>			
§ 2801; LR-2-77	Inc. Tax—Tax on certain generation-skipping transfers—Part 26—Effective date (TRA 1976, § 2006(c)) (Grundeman/Smith—TLC-Gutman).	TLC & T:—12/22/78 Notice pub.; 4/10/79 Hrg. held; 8/3/79 Draft of T.D. to TLC & T:.	1
§§ 2601-2603; LR-178-76	Tax on certain generation-skipping transfers—Part 26—Imposition & amount of, and liability for, tax (TRA 1976, § 2006(a)) (Waltuch/Smith—TLC-O'Laughlin).	LR—In LR for prep of notice	3
§§ 2611-2614; LR-205-78	Ext. & Gift—Part 26—Tax on generation-skipping transfers—Definitions and special rules (TRA 1976, § 2006(a)) (Waltuch/Smith—TLC-O'Laughlin).	LR—8/16/79 Draft of notice ret'd. to LR for rev	1
§ 2621; LR-234-79	Temp. Regs.—Generation-skipping transfers tax return requirement, etc. (TRA 1976, § 2006(a)) (Waltuch/Smith).	LR—In LR for prep of T.D.	2
§§ 2622, 2013(g), 691(c), 303(d); LR-202-76	Inc. Tax—Est. Tax—Tax on certain generation-skipping transfers Parts 1, 20 & 26—Misc. provisions relating to generation-skipping transfers (TRA 1976, § 2006 (a), (b)) (Harman/Smith—TLC-O'Laughlin).	TLC & T:—5/8/78 Draft of notice to TLC & T:.	3
§§ 2621(c)(1), 2611; LR-197-76	Proc. & Admin.—Part 404—Temp. Regs.—Generation-skipping transfer tax return requirements, etc. (TRA 1976, § 2006(a)) (Waltuch/Smith—TLC-O'Laughlin).	TLC & T:—11/1/79 Rev. draft of T.D. to TLC & T:.	2
§§ 3121(b)(20), 1402(c)(2)(F), 3401(a)(17), 6050A; LR279-78	Empl. Tax—Part 31—Proc. & Admin.—Part 301—Withholding of Federal taxes on certain individuals engaged in fishing (TRA 1976, § 1207(e)) (Ausness/Coulter—TLC-Koppelman).	LR—2/28/80 Notice approved by CC/DED	2
§ 3121(t); LR-35-78	Empl. Tax—Part 31—Soc. sec. tax on employers of individuals who receive income from tips (§ 315, Soc. Sec. Amdmts. of 1977) (Murphy/Bromell—TLC-Goodman).	LR—7/25/79 Notice ret'd. to LR for revision	2
§ 3401(a)(18); LR-212-78	Empl. Tax—Part 31—Remuneration with respect to which a deduction may be allowable for certain expenses of living abroad (Foreign Earned Income Act of 1978, §§ 207(a), 209(b)) (Dean/Saverude—TLC-Roche/Dolan).	Treas.—1/14/79 Notice pub.; 1/4/79 Temp. Regs. T.D. 7588 pub.; 2/29/80 T.D. to Treas. for formal approval.	2
§ 3401(a)-1, (b); LR-74-77	Empl. Tax—Part 31—To modify requirements with respect to sick pay (TRA 1978 § 505; (Marcinko/Coulter—TLC-Koppelman).	TLC & T:—6/26/79 Notice fwd. for formal approval	2
§ 3402; LR-81-78	Empl. Tax—Part 31—Submission of withholding exemption certificates (Mantle/Saverude—TLC-Koppelman).	Treas.—10/9/79 Notice pub.; 1/4/80 Hrg. held; 2/27/80 T.D. to Treas. for formal approval.	2
§ 3402(q); LR264-78	Empl. Tax—Part 31—Withholding on certain gambling winnings (TRA 1976, § 1207(d)) (MacMaster/Coulter—TLC-Koppelman).	LR—11/15/79 Notice pub.; 2/26/80 Hrg. held	2
§ 3506 LR-37-78	Empl. Tax—Part 31—Companion sitting placement services (§ 10, Act of Nov. 12, 1977 (Pub. L. 95-171)) (Cubeta/Bromell—TLC-Roche).	Commr.—5/30/79 Notice pub.; 2/20/80 T.D. to Commr. for formal approval.	2
§ 3507 LR-188-78	Empl. Tax—Part 31—Advance payments of earned income credit (RA 1976, § 105(b)) (Murphy/Saverude—TLC-Goodman).	TLC & T:—5/9/79 Notice pub.; 11/13/79 Hrg. held; 11/30/79 Draft of T.D. to TLC & T:.	2
§§ 4041(b); 4063(a), (b), (e), 4093; 4221(d)(7), (e)(5) & (6); 6416(b)(2)(i); 6421(a), (b), d(3); 6424, 6427; LR-173-78	Exc. Tax—Various amdmts. under the Energy Tax Act of 1978, §§ 222, 231, 232, 233, 404; & Rev. Act of 1978, § 701(f) (Alexander/Smith).	LR—In LR for prep of notice	2
§§ 4041, 4042, 4054, 4058 LR-2118	Exc. Tax—Applicable to articles sold on or after 7/1/65 (Pub. L. 89-44) (Hartley/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision	3
§§ 4061, 4063 LR-2119	Exc. Tax—Applicable to motor vehicles sold on or after 7/1/65 (Pub. L. 89-44) (Small/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision	3
§ 4064 LR-205-78	Exc. Tax—Part 48—Gas guzzler tax (Energy Tax Act 1978, § 201) (Murphy/Whoo—TLC-Copeland).	LR—2/8/80 Notice pub.	1
§§ 4071-4073 LR-2114	Exc. Tax—Applicable to tires, etc. sold on or after 7/1/85 (Pub. L. 89-44) (Tolleris/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision	3
§§ 4081-4084, 4091-4092, 4101, 4102 LR-2117	Exc. Tax—Applicable to gasoline & lubricating oil sold on or after 7/1/65 (Pub. L. 89-44) (Hartley/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision	3
§§ 4091-4041, 4073, 4083, 4093, 4221; LR-58-79	Mfgs. & Retailers Exc. Tax—Maximum period for certain exemption certificates (Alexander/Smith).	LR—2/27/80 T.D. approved by Treas.	2
§§ 4218(a), 4121, 4221(a), 4293, 6418; LR-61-78	Mfgs. & Retira. Exc. Tax—Part 48—Excise tax on coal (Black Lung Benefits Rev. Act of 1978, § 2) (Waltuch/Smith—TLC-Copeland).	LR—8/27/79 Notice pub.; 1/10/80 Hrg. held	2
§ 4221-2; LR-58-79	Mfgs. & Retira. Exc. Tax—Part 48—Tax-free sales of articles to be used for, or resold for, further manufacture (Coplan/Smith).	TLC & T—2/13/80 Draft of notice to TLC & T	2
§ 4221-2(c); LR-116-79	Exc. Tax—Part 48—Tax-free sales by manufacturers (Kusma/Smith—TLC-Copeland).	LR—2/20/80 T.D. 7681 approved by Treas.	3
§ 4942(e)(2); LR-289-76	Foundation Exc. Tax—Part 53—Blockage and similar factors in valuation of foundation assets (TRA 1976, § 1303) (Dickinson—TLC-Gutman).	Treas.—2/22/80 Notice to Treas. for formal approval	2
§§ 6001-6427, 4161, 4181; LR-2115	Exc. Tax—Part 52—Sporting goods & firearms & admin. provs. of special application to Mfgs. & Retira. Exc. Tax (Exc. Tax Reduction Act 1965 & other subsequent legislation through Rev. Act 1971) (Kusma/Saverude—TLC-Copeland).	TLC—5/2/75 Rev. draft of notice to TLC & T:; 7/15/78 Comments from T:.	3

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Part I.—Regulations Under Development in the Legislation and Regulations Division—Continued			
§ 6001; LR-133-76.....	Proc. & Admin.—Part 301—Conditions under which books & records of controlled for. corps. & orgs. will be required to be maintained in the U.S. (Boura/Felton—ITC-Fogaras).	LR—In LR for prep of notice.....	2
§§ 6039A, 6694; LR-195-76.....	Inc. Tax—Part 1—Proc. & Admin.—Part 301—Information regarding carryover property acquired from a decedent (TRA 1976, § 2005(d)) (Waltuch/Smith—TLC-Sorensen).	LR—In LR for prep of notice.....	2
§ 6103(d)(1); LR-5-80.....	Proc. & Admin.—Part 301—To prescribe rules for disclosure of returns & return information (Dickinson).	Tech—1/24/80 Notice fwd. for formal approval.....	2
§ 6103(p)(7); LR-9-79.....	Proc. & Admin.—Part 301—Procedures for administrative review of determination that a State or agency thereof has failed to safeguard Federal tax returns or return information (TRA 1976, § 1202(a)(1)) (Tolleris/Coulter—TLC-Krupsky).	TLC & T—10/2/79 Notice pub.; 2/27/80 T.D. fwd. for formal approval.....	2
§ 6103 (a), (c), (d)(1), (k)(6), (l)(2), & (m); LR-140-77.....	Proc. & Admin.—Part 301—Disclosure of return information by IRS officers & employees for investigative purposes (TRA 1976, § 1202(a)) (Dickinson—TLC-Krupsky).	Commr.—1/6/80 Notice to Commr. for formal approval.....	3
§§ 6154, 6655; LR-140-76.....	Inc. Tax—Part 1—Payment of estimated tax by corporations (Carney/Mantle—TLC-Flynn).	T.C.—3/29/79 Final draft of notice to TLC & T.C.; 11/15/79 Comments from TLC.....	2
§§ 6166, 6166A; LR-210-76.....	Exc. Tax—Part 20—Proc. & Admin.—Part 301—Deferral and instalment payment of estate tax (TRA 1976, § 2004(a); RA 1976, § 512) (Chamas/Bromell—TLC-Flynn).	LR—In LR for prep of notice.....	2
§ 6205; LR-85-79.....	Empl. Tax—Part 31—Interest-free adjustment where employer erroneously files Form 941 & pays FICA tax on employee's wages rather than RRTA tax (Tolleris/Coulter—TLC-Goodman).	TLC & T.J.—10/25/79 Draft of notice to TLC & T.J.....	2
§ 6302; LR-10-79.....	Empl. Tax—Part 31—To change the deposit requirement for withheld income & FICA taxes (Tolleris/Coulter—TLC-Koppelman).	LR—2/6/80 Notice pub. 4/16/80 Hrg. to be held.....	1
§§ 6324A, 2204(c); LR-209-76.....	Est. Tax—Proc. & Admin.—Parts 20 & 301—Special lien for estate tax deferred under sec. 6166 or 6166A (TRA 1976, § 2004(d)) (Murphy/Bromell—TLC-O'Laughlin).	LR—In LR for prep of notice.....	2
§ 6324(B); LR-201-76.....	Est. Tax—Proc. & Admin.—Parts 20 & 301—Special lien for additional estate tax attributable to farm, etc. valuation (TRA 1976, § 2003(b)) (Stevenson/Bromell—TLC-Melton).	TLC—11/30/79 Draft of notice to TLC & T.J.; Comments from T.J.....	2
§§ 6332, 7401; LR-1691.....	Proc. & Admin.—Part 301—Enforcement of liens & levies upon a taxpayer's property held by a foreign office of a financial institution engaged in business in the U.S. or a possession of the U.S. (Alexander/Smith—ITC-Dolan).	T.J.—9/26/79 Rev. draft of notice to ITC & T.J.; 1/16/80 comments from ITC.....	1
§§ 6420, 6427; LR-161-79.....	Exc. Tax—Part 48—Payments for gasoline & special fuels used on farms for farming purposes (TRA 1976, § 1906(a)(26); Airport & Airways Rev. Act 1970, § 205(b)(7); Exc. Tax Reduction Act 1965, § 809(a)) (Hartley/Smith—TLC-Copeland).	LR—12/27/79 Notice pub.....	2
§§ 6601(j), 6161 (a), (b), 6163(b), 6503(d), 7403(a), 2011(c)(2), 2204 (a), (b); LR-198-76.....	Est. Tax—Proc. & Admin.—Parts 20 & 301—Misc. Procedural amdmts. relating to estate tax (TRA 1976, § 2004(b), (c), (f); RA 1976, § 702(p)) (Stevenson/Bromell—TLC-Melton).	TLC—11/30/79 Draft of notice to TLC & T.J.; Comments from T.J.....	3
§ 7216 LR-251-79.....	Proc. & Admin.—Part 301—To provide that penalty shall not apply in the case of certain conflicts of interest (Bouknight/Saverude—TLC-Flynn).	LR—2/21/80 Notice pub.....	2
§ 7502; LR-1406.....	Proc. & Admin.—Part 301—Amdmt. of regs. relating to the timely mailing of deposits (Pub. L. 90-364, § 106) (Lanning/Fischer—TLC-Levinson).	LR—12/11/79 Notice pub.....	3
§§ 7517, 2031(c), 2616(c), 6075(b); LR-215-76.....	Est. Tax—Gift Tax—Proc. & Admin.—Parts 20, 25, 301—Furnishing on request of statement explaining estate or gift valuation and filing of gift tax returns (TRA 1976, § 2008 (a), (b)) (Waltuch/Smith—TLC-O'Laughlin).	LR—12/19/79 Notice pub.....	3
§§ 7609, 7610; LR-164-76.....	Proc. & Admin.—Part 301—Administrative summons (TRA 1976, § 1205) (Clark/Fischer—TLC-Koppelman).	LR—2/21/80 Ret'd. to LR for revision.....	3
§ 7701-2; LR-232-76.....	Proc. & Admin.—Part 301—Classification of entities organized under Uniform Limited Partnership Act, Rev. Act 1976 (Francis/Bromell—TLC-Levinson/Koppelman).	TLC—1/16/80 Rev. draft of notice to TLC.....	2
LR-149-75.....	Inc. Tax—Part 3—Maritime Capital Construction Fund (Pub. L. 91-469, § 801, Merchant Marine Act, 1936) (Thompson/Saverude—TLC-Krupsky).	LR—1/29/76 Notice pub.; 7/7/76 Hrg. held; In LR for prep of T.D.....	2
LR-265-74.....	Treatment of taxation of currency, gains and losses (Horowitz/Felton—ITC-Krupsky).	LR—In LR for prep of notice.....	2
LE-71-76.....	Exc. Tax—Parts 16 & 17—(1939 Code) Vinson Act—Amdt. of T.D. 4906 & T.D. 4909—Recovery of excessive profits on Government contracts (Hartley/Smith—TLC-Brown).	LR—10/28/79 Notice pub.; 3/12/80 Hrg. to be held.....	1
LR-12-79.....	Proc. & Admin.—Part 301—Establishment of Off-shore Oil Pollution Compensation Fund (Pub. L. 95-372, § 302 (Sept. 16, 1978)) (Kusma/Smith—TLC-Copeland/Shakow).	TLC & T—7/20/79 Notice pub.; 11/13/79 Draft of T.D. to TLC & T.....	2

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part II.—Regulations Under Development by the Employee Plans and Exempt Organizations Division</i>			
§ 46; EE-1-78	Inc. Tax—Part 1—Employee stock ownership plan requirements for Obtaining up to additional 1/2% investment credit (TRA 1976, § 803(d)) (Horowitz/Marget—TLC-Melton).	EE—8/17/79 Notice pub. in EE for prep of T.D.	2
§§ 46, 401(a); EE-4-78	Inc. Tax—Part 1—Misc. provisions relating to employee stock ownership plans (TRA 1976, § 803 (b)(2), (3), (c) & (d)) (Horowitz/Thrasher—TLC-Melton).	E—1/19/79 Notice pub.; 6/28/79 Hearing held; 9/11/79 Prelim. draft of T.D. to TLC & E; 1/7/80 Comments from TLC.	2
§ 105(h); EE-187-78	Inc. Tax—Part 1—Medical expense reimbursement plans (Pub. L. 95-600, § 366) (Cobb/Wickersham—TLC-Melton & Sorenson).	EE—2/28/80 Notice pub.	1
§§ 120, 501(c)(20); EE-5-78	Inc. Tax—Part 1—Prepaid legal expenses (TRA 1976, § 2134) (Johnson/McGovern—TLC-Krupsky).	E—12/17/79 Notice fwd. for formal approval	1
§ 120(c)(4); EE-34-78	Inc. Tax—Part 1—Notification to Secretary that a plan is applying for recognition as a qualified group legal services plan (TRA 1976, § 2134) (Johnson/McGovern—TLC-Krupsky).	E—12/17/79 T.D. fwd. for formal approval	2
§ 125; EE-16-79	Inc. Tax—Part 1—Tax Treatment of Cafeteria Plans (Rev. Act of 78 § 134) (Baker/Thrasher—TLC-Sorenson).	E—12/7/79 Prelim. draft of notice to TLC & E; 1/2/80 Comments from TLC.	1
§§ 127, 3121(a)(18), 3401(a)(18), 3306(b)(13); EE-178-78	Inc. Tax—Part 1—Educational Assistance Programs (Rev. Act of 78 § 164) (Kerby/McGovern—TLC-Roche).	EE—In EE for prep. of notice	2
§§ 219, 220, 408, 409, 4973, 4974; EE-7-78	Inc. Tax—Part 1—Retirement Income Plan Excise Taxes—Part 54, Retirement accounts for certain married individuals and Individual Retirement Account Technical Changes (TRA 1976, §§ 1501, 1503, Rev. Act of 1976, §§ 156, 157) (Gibbs/Wickersham—TLC-Melton).	EE—10/15/79 Prelim. draft of notice to TLC & E; 1/28/80 Comments fm TLC & E.	2
§§ 263, 404, etc.; EE-56-78	Inc. Tax—Part 1—Capitalization of pension costs and other indirect costs attributable to self-constructed assets (<i>Comm. v. Idaho Power Co.</i> , 418 U.S. 1 (1974)) (Horowitz-Marget—TLC-Krupsky).	TLC—5/10/79 Prelim. draft of notice to TLC, T.C & E; 5/24/79 Comments rec'd fm T.C & E.	1
§§ 401(a), 501(a); EE-39-78	Inc. Tax—Part 1—Treatment of Puerto Rican retirement plans (Pub. L. 93-406, § 1022(f)) (Sumter/Thrasher—ITC-Langbein).	ITC & E—8/31/79 Rev. prelim. draft of notice to ITC & E.	2
§ 401(a)(5); EE-8-78	Inc. Tax—Part 1—Comparability of plans for vesting (ERISA, § 1012 (b)) (Hennessy/Wickersham—TLC-Melton).	TLC & EA—2/7/80 Rev. prelim. draft of notice to TLC & EA.	3
§ 401(a)(18), (j); EE-29-78	Inc. Tax—Part 1—Defined benefit plans for H.R. 10 & Subch. 8 corps. (Pub. L. 93-406, § 2001(d)) (Hennessy/Wickersham—TLC-Sorenson).	E—5/26/78 Notice pub.; 10/4/78 Hearing held; 12/17/79 Prelim. draft of T.D. to TLC & E; 2/1/80 Comments fm TLC.	1
§ 401-4(c); EE-11-78	Inc. Tax—Part 1—To conform the "High 25 employee rule" to sec. 4022 of ERISA, "guaranteed benefits" (Hirsh/Wickersham—TLC-Sorenson).	TLC—7/13/79 Prelim. draft of notice to TLC & E; 8/16/79 Comments fm E.	2
§§ 401(k), 402(a)(8); EE-168-78	Inc. Tax—Part 1—Certain cash or deferred arrangements (Rev. Act of 1978, § 135) (Hirsh/Wickersham—TLC-Melton & Sorenson).	TLC & E—10/8/79 Prelim. draft of notice to TLC & E.	1
§§ 402(a)(2), 402(e), 403(a)(2)(A)(ii); EE-14-78	Inc. Tax—Part 1—Treatment of certain lump sum distributions (Pub. L. 93-406, § 2005) (Johnson/Wickersham—TLC-Melton).	TLC & EP—4/30/75 Notice pub.; 8/12/76 Hearing held; 9/17/79 2nd rev. draft of T.D. to TLC & EP.	2
§§ 402(a) (5), (8), (7), 401(a)(20), 403 (a)(4), (a)(5), (b)(1), (b)(8), 404(a)(2), 805(d)(1)(c); EE-15-78	Inc. Tax—Part 1—Tax-free rollovers of lump sum distributions and plan termination payments. (Pub. L. 94-267; Pub. L. 95-458, § 4; Rev. Act 1978, §§ 156 (a), (b), 157 (f), (g), (h)(1)) (Johnson/Wickersham—TLC-Melton).	TLC & E—2/19/80 2d rev. prelim. draft of notice to TLC & E.	2
§ 402(e)(4)(L); EE-16-78	Inc. Tax—Part 1—Lump sum distributions from qualified pension, etc. plans (TRA 1976, § 1512) (Johnson/Wickersham—TLC-Melton).	TLC & EP—5/31/79 Notice pub.; 9/17/79 Prelim. draft of T.D. to TLC & EP.	3
§ 403(b)(7); EE-17-78	Inc. Tax—Part 1—Taxability of beneficiary under annuity purchased by sec. 501(c) organization or public school (Pub. L. 93-406, § 1022(e); TRA 1976, § 1504) (Hartley/Thrasher—TLC-Melton).	TLC—2/10/78 Notice pub.; 2/13/79 Prelim. draft of partial rev. notice to TLC & E; 5/16/79 Comments fm E.	2
§§ 404 (a)(1), (3)(A), (6), (7)(g), 413 (b)(7), (c)(8); EE-33-78	Inc. Tax—Part 1—Deduction limitation (Pub. L. 93-406, §§ 1014, 1013(c) (1), (2), (3), 204(b), 4081(a); TRA 1975 (Pub. L. 94-12) § 402 amending 1964 Code § 404(a)(6)) (Rogan/Marget—TLC-Sorenson).	EE—5/19/78 Notice pub.; 4/2/79 Prelim. draft of T.D. to TLC & E; 10/23/79 Comments fm TLC & E.	2
§§ 404 (a)(1), (a)(6), (a)(7), (a)(3)(A), and (g); 412(c)(2)(A); 413(b)(7) and (c)(6); EE-141-79	Inc. Tax—Part 1—Deduction limitations and funding rules for valuing certain agreements (Pub. L. 93-406, §§ 1013, 1014, 4081(b); (Pub. L. 94-12, § 402) (Rogan/Marget).	EE—In EE for prep of notice	2
§ 404 (d), (b); EE-44-79	Inc. Tax—Part 1—Deferred Compensation payments to independent contractors (Rev. Act of 1978, § 133) (Greenblatt/Thrasher—TLC-Sorenson).	EE—In EE for prep of notice	2
§§ 408, 409, 219, 4973, 4974, 62; EE-16-78	Inc. Tax—Part 1—Individual retirement accounts, annuities, & retirement bonds (Pub. L. 93-406, § 2002) (Gibbs/Wickersham—TLC-Melton).	EE—2/21/75 Notice pub.; 11/19/75 Supplemental notice pub.; 3/23/79 Partial rev. notice pub.; 7/10/79 2nd prelim. draft of T.D. (not act. part.) to TLC & E; 7/19/79 Hrg. held on partial rev. notice; 8/28/79 Comments fm E; 1/28/80 Comments fm TLC.	2
§§ 408 (l), (k), (i), 219(b)(7), 404(h); EE-168-78	Inc. Tax—Part 1—Simplified employee pensions (Rev. Act of 1978, § 152) (Gibbs/Wickersham—TLC-Melton).	EE—10/15/79 Prelim. draft of notice to TLC & E; 1/28/80 Comments from TLC & E.	1
§ 408(f); EE-109-79	Inc. Tax—Part 5—Temporary Regs. relating to reporting and disclosure requirements for simplified employee pensions (Rev. Act of 1978, § 152(b)) (Pub. L. 95-600) (Gibbs/Wickersham—TLC-Melton).	E—2/11/80 T.D. fwd. for formal approval	1

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
<i>Part II.—Regulations Under Development by the Employee Plans and Exempt Organizations Division—Continued</i>			
§ 410; EE-20-78	Inc. Tax—Part 1—Coverage & eligibility rules for minimum participation standards (ERISA, § 1011) (Cobb/Wickersham—TLC-Sorensen).	TLC & E—4/20/79 Notice pub.; 9/24/79 Prelim. draft of T.D. to TLC & E.	1
§§ 411, 410; EE-4-79	Inc. Tax—Part 1—Elapsed time rules for minimum vesting and participation requirements. (ERISA, §§ 1012(a), 1011) (Maldonado/Wickersham—TLC-Melton).	EE & DOL—12/28/78 Notice pub. by Dept. of Labor; 12/28/79 T.D. fwd. to E for formal approval; fwd. to DOL per § 106, R.P. #4 of 1978; 1/17/80 T.D. approved by E.	2
§ 411(d)(1); EE-164-78	Inc. Tax—Part 1—Coordination of vesting and non-discrimination requirements for qualified plans (ERISA, § 1012(a)) (Maldonado/Wickersham—TLC-Melton).	Treas.—2/29/80 Notice to Treas. for formal approval.	2
§ 412; EE-32-78	Inc. Tax—Part 1—Alternative amortization method of funding (Pub. L. § 1013(d)) (Greenblatt/Marget—TLC-Sorensen).	TLC & EA—11/23/79 Notice pub.; 1/29/80 Prelim. draft of T.D. to TLC & EA.	2
§ 412(b)(3); EE-101-78	Inc. Tax—Part 1—Credits to funding standard account (ERISA, § 1013(a)) (Rogan/Marget—TLC-Sorensen).	EE—12/29/78 Notice pub.; 2/21/80 Hearing held	2
§§ 412, 413 (b)(5), (c)(4); EE-99-78	Inc. Tax—Part 1—Funding for qualified plans (ERISA, §§ 1013(a), (1014)) (Rogan/Marget—TLC-Sorensen).	TLC & E—11/18/79 Prelim. draft of notice to TLC & E	2
§ 412(c)(1); EE-100-78	Inc. Tax—Part 1—Determinations to be made under funding method (ERISA, § 1013(a)) (Rogan/Marget—TLC-Sorensen).	TLC & EA—8/4/77 Notice pub.; 1/28/80 Rev. prelim. draft of T.D. to TLC & EA.	2
§ 412(c)(2); EE-102-78	Inc. Tax—Part 1—General rules for valuation of assets (ERISA, § 1013(a)) (Rogan/Marget—TLC-Sorensen).	TLC & E—8/25/78 Notice pub.; 1/11/79 Hearing held; 11/30/79 Rev. prelim. draft of T.D. to TLC & E; 2/6/80 Chngd. pages to TLC & E.	2
§ 412(c)(3); EE-150-78	Inc. Tax—Part 1—Reasonable actuarial methods (ERISA, § 1013(a), 3(31)) (Rogan/Marget—TLC-Sorensen).	EE—10/5/79 Notice pub.; 2/21/80 Hearing held	2
§ 412(i); EE-21-78	Inc. Tax—Part 1—Treatment of certain individual & group insurance contract plans under minimum funding standards (Pub. L. 93-406, § 1013(a)) (—/Wickersham—TLC-Sorensen).	E—2/6/75 Notice pub.; 2/27/80 T.D. fwd. for formal approval.	2
§ 414(a); EE-22-78	Inc. Tax—Part 1—Definitions and special rules; Service for predecessor (Pub. L. 93-406, § 1015) (Misher/Wickersham—TLC-Melton).	EE—In EE for prep of notice	2
§ 415; EE-24-78	Inc. Tax—Part 1—Limitation on contribution and benefits (Pub. L. 93-406, § 2004) (Misher/Wickersham—TLC-Melton).	EE—1/24/80 Notice pub.	1
§ 457; EE-176-78	Inc. Tax—Part 1—Deferred compensation plans of State and Local Governments (Rev. Act. '78, § 131) (Kamikawa/McGovern—TLC-Melton).	TLC—10/10/79 Rev. prelim. draft of notice to TLC & T.I.; 12/20/79 Comments fm T.I.I.	1
§§ 501(c)(3), 170(c)(2)(B), 2055(a), 2522(a); EE-53-79	Inc. Tax—Part 1, Estate Tax—Part 20, Gift Tax—Part 25, Exemption of certain amateur athletic organizations from tax (Tax Reform Act of 1976, § 1313) (Glas/Thrasher—TLC-Sims).	EE—5/10/79 Notice pub. under LR-172-76; 10/9/79 Hearing held in EE for prep of T.D.	3
§ 501(c)(7) & (g); EE-43-78	Inc. Tax—Part 1—Tax treatment of certain social clubs & prohibition of discrimination by certain social clubs (Pub. L. 94-568) (Sumter/Thrasher—TLC-Sims & O'Laughlin).	E—12/5/79 Rev. prelim. draft of notice to E	2
§ 501(c)(9); EE-153-78	Inc. Tax—Part 1—Voluntary employees beneficiary associations (as amended by sec. 121(b)(5)(a); TRA 1969) (Greenblatt/Thrasher—TLC-Sims).	TLC—1/23/69 Notice pub.; 4/1/69 Hearing held; 12/17/79 Prelim. draft of rev. notice to TLC & E; 1/16/80 Comments from E.	1
§ 501(c)(13), (c)(2); EE-171-78	Inc. Tax—Part 1—Exempt cemetery corporations and exempt crematoria—Exempt title holding corporations (Pub. L. 91-618) (Baker/Thrasher—TLC-Sims).	Treas.—7/8/75 Notice pub.; 11/29/78 Rev. notice pub.; 3/29/79 Hearing held; 2/5/80 T.D. to Treasury for approval.	3
§ 501(e); EE-44-78	Inc. Tax—Part 1—Amdmt. of regs. to reflect the grant of tax exempt status to certain Hospital Service Orgs. (Pub. L. 90-364, § 109) (Baker/Thrasher—TLC-Sims).	TLC—8/31/78 Prelim. draft of notice to TLC & EPEO; 10/6/78 Comments Rec'd from EPEO.	3
§ 501(h), 504, 4911, 170(f); EE-154-78	Inc. Tax—Part 1—Lobbying by public charities (TRA 1976, § 1307 (a), (b) (Baker/McGovern—TLC-Sims).	TLC & E—2/28/80 3d prelim. draft of notice to TLC & E	1
§ 509(a)(2); EE-45-78	Inc. Tax—Part 1—Definition of a private foundation (Pub. L. 94-81, § 3) (Sumter/Thrasher—TLC-O'Laughlin).	EE—7/24/79 Notice pub.; 11/19/79 T.D. fwd. for formal approval; 1/17/80 Approved by E.	3
§§ 512, 514, 851, 4940; EE-146-78	Inc. Tax—Part 1—Excise Tax—Part 53, Treatment of income from payments with respect to securities loans (Pub. L. 95-345, § 2) (Kamikawa/McGovern—TLC-Sims).	TLC—10/25/79 Prelim. Draft of notice to TLC & E; 11/20/79 Comments fm E.	3
§ 513(d); EE-155-78	Inc. Tax—Part 1—Activities of trade shows and state fairs (TRA 1976, § 1305) (Horowitz/Thrasher—TLC-Sims).	EE—9/7/79 Notice fwd. for formal approval; 11/20/79 Notice ret'd. to EE for revision.	2
§ 513(e); EE-46-78	Inc. Tax—Part 1—Hospital services not to constitute an unrelated trade or business (TRA 1976, § 1311) (Kerby/McGovern—TLC-Sims).	TLC—3/27/79 Prelim. draft of notice to TLC & EO; 4/9/79 Comments fm EO.	2
§ 513(f), 527(c)(3)(d); EE-180-78	Inc. Tax—Part 1—Proceeds from bingo games (Pub. L. 95-502, § 301) (Kerby/McGovern—TLC-Sims).	E—2/28/80 T.D. fwd. for formal approval	3
§§ 1379, 62—EE-35-78	Inc. Tax—Part 1—Qualified pension, etc. plans of small business corps. (§ 531, TRA 1969) (Stein/McGovern—TLC-Melton).	TLC & E—5/8/72 Notice pub.; 7/24/72 Conference held; 11/9/79 Rev. prelim. draft of T.D. to TLC & E.	1
§§ 2039 (c), (e), 2517; EE-25-78	Est. & Gift—Parts 20 & 25—Exclusion of certain retirement benefits from gross estate (TRA 1976, § 2009(c), Rev. Act 1976, § 142) (Johnson/Wickersham—TLC-Sorensen).	TLC—3/2/79 Notice pub.; 11/26/79 Prelim. draft of T.D. to TLC & T.I.; 12/28/79 Comments from T.I.	3

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part II.—Regulations Under Development by the Employee Plans and Exempt Organizations Division—Continued			
§ 4942(g)(2); EE-156-78	Foundation Excise Tax—Part 53—Private foundation set-asides (TRA 1976 § 1302) (Kerby/McGovern—TLC-O'Laughlin).	EE—11/8/79 ed rev. draft of notice to TLC & E; 12/12/79 Comments from E; 2/28/80 Comments fm TLC.	3
§ 4942(j)(6); EE-2-79	Foundation Excise Tax—Part 53—Certain elderly care facilities (Rev. Act of 1978 § 522) (Kerby/McGovern—TLC-O'Laughlin).	EE—2/6/80 Notice fwd. for formal approval; 2/20/80 Notice approved by E.	3
§ 4943; EE-182-78	Foundation Excise Tax—Part 53, Taxes on excess business holdings of private foundations—Effect of reorganizations and corporate distributions (Hennessy/Wickersham—TLC-Levinson).	TLC—5/22/79 Notice pub.; 8/18/79 Partial rev. notice pub.; 9/6/79 Hrg. held; 12/3/79 Prelim. draft of T.D. to TLC & E; 1/17/80 Comments from E.	2
§§ 4971, 275(a)(8), 413(b)(6), (c)(5); EE-36-78	Inc. Tax—Part 1—Exc. Tax—Part 54—Funding; Collectively bargained plans; excise tax & related conforming amdmnts. (Pub. L. 93-406, §§ 1013(b), 1015, 1016(a)(1)) (Rogan/Marget-TLC-Melton & Sorensen).	TLC & E—8/18/79 Prelim. draft of notice to TLC & E.	2
§§ 4972, 401(a)(10)(A)(ii), 401 (c)(2), (d)(3), (j)(4), 1379(b); EE-37-78.	Inc. Tax—Part 1—Exc. Tax—Part 54—H.R. 10 plans, excess contributions and premature distributions (Pub. L. 93-406, §§ 1022(b), 2001 (b), (e), (f), (h) (1)) (Maldonado/Wickersham—TLC/Sorensen).	TLC & E—3/29/79 Notice pub.; 6/18/79 Prelim. draft of T.D. to TLC & E.	2
§§ 6059, 6692; EE-27-78	Proc. & Admin.—Part 301—Periodic report of actuaries; and failure to file actuarial report (Pub. L. 93-406, § 1033) (Johnson/McGovern—TLC-Sorensen).	TLC—9/19/79 Revised draft of notice to TLC & E; 10/10/79 Comments fm E.	3
§ 8104(a); EE-28-78	Proc. & Admin.—Part 301—Inspection of certain information with respect to pensions, profit-sharing, & stock bonus plans (Pub. L. 93-406, § 1022(g)) (Johnson/McGovern—TLC-Sorensen).	E—8/2/77 Rev. draft of notice to TLC & E; 8/31/77 Comments fm E; 3/31/79 Two issues awaiting resolution with E.	2
§ 8104(b); EE/160-78	Proc. & Admin.—Part 301—Procedures used for making returns filed by exempt organizations available for public inspection (Hennessy/Wickersham—TLC-Sims).	TLC—11/5/79 Prelim. Draft of T.D. to TLC & E; 11/26/79 Comments fm E; 11/29/78 Prelim. draft of T.D. to TX:D; 2/8/80 Comments fm TX:D.	3
§ 8211; EE-159-78	Proc. & Admin.—Part 301—Deficiency procedures, etc. relating to excise taxes imposed by Chapters 42 and 43 (Hirsh/Wickersham—TLC-O'Laughlin).	EO & EP—12/28/79 Notice fwd. for formal approval	3
§ 6693, etc.; EE-19-78	Inc. Tax—Part 1—Reporting requirements, penalties & conforming amdmnt. re individual retirement accounts (ERISA, §§ 2002 (f), (g) (exc. g)(5)) (Maldonado/Wickersham—TLC-Melton).	TLC, E & T—8/20/79 Notice pub.; 12/20/79 Prelim. draft of T.D. to TLC, E & T.	3
Part III.—Regulation Projects Under Which Existing Regulations Are to Be Reviewed Pursuant To Paragraph 12 of Treasury Directive 50-04.F			
§§ 3, 4, 144; LR-249-78	Inc. Tax—Part 1—Tax tables for individuals (§§ 206, 301 (b), (c), Rev. Act 1971; § 501, TRA 1976) (Coughlin/Saverude).	LR—in LR for prep of notice	2
§§ 11, 21; LR-33-78	Inc. Tax—Part 1—Corporate tax rates & surtax exemptions (Rev. Act, Act 1975, § 4) (TRA 1976, § 901(a), (e)(2)) (Murphy-Saverude).	LR—in LR for prep of notice	2
§ 37; LR-250-78	Inc. Tax—Part 1—Credit for the elderly (TRA 1976, §§ 503, 1901(c)(1)) (Francis/Bromell—TLC-Flynn).	LR—2/27/80 Notice pub.	2
§§ 104 (a) & (b), 105 (d); LR-159-78	Inc. Tax—Part 1—Changes in exclusion for sick pay & certain military etc., disability pensions; Certain disability income (TRA 1976, § 505; TR&SA, § 301) (Parcell/Fischer—TLC-O'Laughlin).	TLC & T—12/19/79 Notice fwd. for formal approval	2
§ 303; LR-124-78	Inc. Tax—Part 1—Distributions in redemption of stock to pay death taxes (TRA 1976, § 2004(e)) (Kissel/Blumkin—TLC-Levinson).	TLC—3/3/77 Draft of notice to TLC & T.C; 5/17/77 Approved by T.C.	2
§§ 368(a)(2)(F), 721, 722, 723, 683; LR-135-78	Inc. Tax—Part 1—Exchange funds (TRA 1976, § 2131) (Mull/Blumkin—TLC-Rabinowitz/Krupsky).	TLC & T.C—12/10/79 Rev. draft of notice to TLC & T.C	1
§§ 512(a)(3), 501(c)(7), (9); LR-1744	Inc. Tax—Part 1—Social clubs—Unrelated business income (TRA 1980, § 121(b)(1)) (Mlx/Fischer—TLC-Sims).	EO—5/13/71 Notice pub.; 6/31/71 Hrg. held; 11/27/79 T.D. recirculated for formal approval; 1/4/80 Comments from TLC.	2
§§ 584(a)(1), (c)(1) (A) & (B), (c)(2), (e), 6032; LR-133-78	Inc. Tax—Part 1—Tax treatment of common trust funds (Pub. L.'s 94-414, § 1; 94-455; TRA 1976, §§ 2138(a), 1402(b), 1901(b), 2131(d)) (Schreiner/Coulter—TLC-Sims).	TLC—6/25/79 Notice fwd. for formal approval; 7/30/79 Approved by T.; Awaiting approval by TLC.	2
§§ 856-860, 172 (b), (d), 318(b), 381(c)(25), 443(b)(5), 4981, 6181(b), 6211-6213(a), 6214, 6344(a), 6422, 6503(f), 6512, 8515, 6601(c), 6697, 7422; LR-218-78	Inc. Tax—Part 1—Real Estate investment trusts (TRA 1978, §§ 1801-1808, 1801(a), (b), 1806(a), (f)) (Pub. L. 93-625, § 6) (Whedbee/Blumkin—TLC-Levinson).	TLC—7/7/78 Notice pub.; 12/20/78 Hrg. held; 5/14/79 Draft of T.D. to TLC & T.FP; 8/25/79 Comments from T; 11/8/79 Chngd. pages to TLC.	2
§ 904(b) (2) & (3); LR-228-78	Inc. Tax—Part 1—Limitation on, and treatment of, capital gains for purposes of foreign tax credit (TRA 1976, §§ 1031, 1034; RA 1976, §§ 403(c)(4), 701(u) (2) & (3)) (Feldman/Rock—ITC-Dolan).	ITC—10/25/79 Draft of notice to ITC & T.C; 12/18/79 Comments from TC.	1
§ 904(e); LR-11-77	Inc. Tax—Part 1—Transitional rules for carrybacks & carryovers of foreign tax credits as a result of repeal of per-country limitation by sec. 1031(a), TRA 1978 (Rentfro/Felton—ITC-Dolan).	LR—in LR for prep of notice	2
§ 985; LR-248-78	Inc. Tax—Part 1—Amdmts. affecting DISC pertaining to military sales & incremental export gross receipts (TRA 1976, § 1101 (a), (g)(1) & (5)) (Feldman/Felton—ITC-Langbein).	LR—1/14/80 Notice ref'd. to LR for revision	1

1954 code section and file No.	Subject, draftsman, and reviewer	Office in which pending and status	Priority
Part III.—Regulation Projects Under Which Existing Regulations Are to Be Reviewed Pursuant To Paragraph 12 of Treasury Directive 50-04.F.—Continued			
§ 1250; LR-131-76.....	Inc. Tax—Part 1—Recapture of depreciation on real property (TRA 1976, §§ 202, 1901(b), 1951(e), 2122(b), 2124(a)) (Marcinko/Rock).	LR—In LR for prep of notice.....	3
§ 1348; LR-156-78.....	Inc. Tax—Part 1—Maximum tax on personal service income (TRA 1976, § 302) (Lanning/Dickinson—TLC-O'Laughlin).	LR—5/10/77 Notice ret'd. to LR for revision.....	2
§§ 1491, 1057; LR-236-78.....	Inc. Tax—Part 1—Excise tax on transfers of property to foreign persons to avoid the Federal income tax (TRA 1976, § 1015) (Klein/Felton—ITC-Langbein).	ITC—9/9/77 Rev. draft of notice to ITC & T.C; 7/25/78 Comments from T.C.	1
§§ 4041, 4042, 4054, 4058; LR-2118.....	Exc. Tax—Applicable to articles sold on or after 7/1/67 (Pub. L. 89-44) (Hartley/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision.....	3
§§ 4061, 4063; LR-2119.....	Exc. Tax—Applicable to motor vehicles sold on or after 7/1/65 (Pub. L. 89-44) (Small/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision.....	3
§§ 4071-4073; LR-2114.....	Exc. Tax—Applicable to tires, etc. sold on or after 7/1/65 (Pub. L. 89-44) (Tolleris/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision.....	3
§§ 4081-4084, 4091-4092, 4101, 4102; LR-2117.....	Exc. Tax—Applicable to gasoline & lubricating oil sold on or after 7/1/65 (Pub. L. 89-44) (Hartley/Saverude—TLC-Copeland).	LR—Notice ret'd. to LR for revision.....	3
§ 7502; LR-1406.....	Proc. & Admin.—Part 301—Amdmt. of regs. relating to the timely mailing of deposits (Pub. L. 90-364, § 106) (Lanning/Fischer—TLC-Levinson).	LR—12/11/79 Notice pub.....	3

Part IV.—Regulations Projects Closed Between Sept. 1, 1979, and Feb. 29, 1980

1954 code section and file No.	Subject, drafter, and reviewer	Disposition
§§ 64, 278, 501(a), 2501(a), 6012(a); LR-24-75.....	Inc. Tax—Part 1—Gift Tax—Part 25—Transfers of appreciated property to political organizations and returns of such organizations (Pub. L. 93-625, § 10 (b)-(g), (13)) (Thompson/Coulter—TLC-Schuldinger).	T.D. published in FR on 2-1-80.
§ 166(f); LR-255-78.....	Inc. Tax—Part 1—Deduction for guarantees of business bad debts to guarantors not involved in business (TRA 1976, § 805) (Charnas/Saverude—TLC-O'Laughlin).	T.D. published in FR on 11-29-79.
§ 170(b); LR-49-79.....	Inc. Tax—Part 1—Amendment of § 1.170A-9(g)(2)(iv) to provide that 100% distribution requirement of sec. 170(b)(1)(D)(ii) be considered satisfied (Murphy/Saverude—TLC-O'Laughlin).	T.D. published in FR on 2-29-80.
§ 263(c); LR-210-79.....	Inc. Tax—Part 5a—Temporary Regulations—Option to capitalize or deduct intangible drilling and development costs (Energy Tax Act 1978, § 402(a)) (Cubeta/Woo—TLC-Schuldinger).	T.D. published in FR on 1-30-80.
§§ 341 (a), (f), 301, 312(c), 453(d)(4); LR-764.....	Inc. Tax—Part 1—Limitation on application of sec. 341 in case of certain sales of stock; certain technical amendments (Pub. L. 89-484, §§ 1, 2) (Avelrod/Blumkin—TLC-Sims).	T.D. published in FR on 11-29-79.
§ 367; LR-2-78.....	Inc. Tax—Part 1—Changes in ruling requirements under sec. 367 (other than subsection (a)(2)) (TRA 1976, § 1042(a)) (Horowitz/Felton—ITC-Hoberton).	T.D. published in FR on 10-5-79.
§ 382; LR-57-79.....	Inc. Tax—Part 1—Regulations under sec. 368(b) of RA 1978 (Pub. L. 95-600) relating to election of 1978 Act changes to Code sec. 382 (Yeates/Whadbee—TLC-Cohen).	T.D. published in FR on 10-26-79.
§§ 382, 383, 368(c); LR-138-78.....	Inc. Tax—Part 1—Limitation on certain carryovers (TRA 1976, §§ 806 (e), (f), 1031(b)) (Yeates/Blumkin—TLC-Cohen).	Project closed without regulations on 2-28-80.
§ 413 (a), (b), (b)(2), (b)(3), (b)(8), (c), & (c)(2); EE-30-78.....	Inc. Tax—Part 1—Discrimination & employees of labor unions, collectively bargained plans, exclusive benefit, & plans maintained by more than one employer (Pub. L. 93-406, § 1014) (Cobb/Wickersham—TLC-Melton).	T.D. published in FR on 11-9-79.
§ 414(k)(2); EE-23-78.....	Inc. Tax—Part 1—Rules relating to certain plans (Pub. L. 93-406, § 1015) (Glass/Thrasher).	Project closed without regulations on 2-5-80.
§ 422, 424; LR-157-78.....	Inc. Tax—Part 1—Change in treatment of qualified stock options (Alexander/Fischer—TLC-Sorensen).	T.D. published in FR on 2-29-80.
§ 423; LR-1111.....	Inc. Tax—Part 1—Stock option regulations (Alexander/Fischer—TLC-Sorensen).	T.D. published in FR on 9-26-79.
§ 466(d); LR-216-78.....	Inc. Tax—Part 5—Temporary Regulations—Exclusion from gross income with respect to qualified discount coupon redeemed after close of taxable year (RA 1978, § 373(a)) (Schmalz/Fischer—TLC-Brown).	T.D. published in FR on 11-5-79.
§ 501(c)(3); EE-42-78.....	Inc. Tax—Part 1—Exemption from tax of certain charitable, etc., organizations (Sumter/Thrasher—TLC-Sims).	Project closed without regulations on 1-30-80.
§ 501(c)(12); EE-145-78.....	Inc. Tax—Part 1—Taxation of Mutual or Cooperative Telephone Companies (Pub. L. 95-345, § 1) (Kamikawa/McGovern—TLC-Sims).	T.D. published in FR on 10-16-79.
§§ 501(c)(21), 4951, 4952; EE-170-78.....	Inc. Tax—Part 1—Excise Tax—Part 53—Black Lung Benefits trusts (§ 4 (a), (c), Black Lung Benefits Revenue Act of 1977) (Baker/Marget—TLC-Copeland).	T.D. published in FR on 9-7-79.
§ 642(f); LR-287-78.....	Inc. Tax—Part 1—Cometary perpetual care funds (Pub. L. 94-528) (Coplan/Smith—TLC-Shakow).	T.D. published in FR on 10-26-79.
§§ 852, 857; LR-23-79.....	Inc. Tax—Part 5—Temporary Regulations—To provide additional rules retreatment of capital gains of regulated investment companies and real estate investment trusts (Schreiner/Mantle—TLC-Brown).	T.D. published in FR on 1-24-80.
§ 858(e)(3); LR-149-79.....	Inc. Tax—Part 10—Temporary Regulations—Extensions of grace period for foreclosure property by a real estate investment trust (RA 1978, § 363(c)) (Whedbee/Blumkin—TLC-Levinson).	T.D. published in FR on 1-28-80.
§§ 902, 78, 960, 535(b)(1), 545(b)(1); LR-229-78.....	Inc. Tax—Part 1—Dividends from less developed country corporations to be grossed up for purposes of foreign tax credit (TRA 1976, § 1033) (Renfro/Felton—ITC-Dolan).	T.D. published in FR on 10-18-79.
§ 911; LR-239-79.....	Inc. Tax—Part 5b—Temporary Regulations—Definition of camp. Treatment of foreign earned income derived by U.S. citizens and residents (Foreign Earned Income Act, 1978, § 202) (Dean/Felton).	T.D. published in FR on 12-31-79.

Part IV.—Regulations Projects Closed Between Sept. 1, 1979, and Feb. 29, 1980—Continued

1954 code section and file No.	Subject, drafter, and reviewer	Disposition
§ 936(e); LR-139-78	Inc. Tax—Part 1—Time for making an election (TRA 1978, § 1051(b)) (Horowitz/Felton—ITC/Langbein).	T.D. published in FR on 2-8-80.
§ 1212(a)(1); LR-270-78	Inc. Tax—Part 1—Allowance of 8-year capital loss carryover in case of regulated investment companies (TRA 1978, §§ 1403, 1901(b)(3)(O)) (Schreiner/Coulter—TLC-Levinson).	T.D. published in FR on 12-17-79.
§ 1232(a)(3); LR-43-78	Inc. Tax—Part 1—Treatment of original issued discount on certain short-term obligations (Tolleria/Mantle—TLC-Sims/Brown).	T.D. published in FR on 12-28-79.
§ 1234; LR-274-78	Inc. Tax—Part 1—Tax treatment of the grantor of options of stock, securities and commodities (TRA 1978, §§ 1236, 1402(b)(1)(U)) (Marcinko/Coulter—TLC-Rabinovitz).	T.D. published in FR on 10-30-79.
§ 3121(k); LR-59-77	Empl. Tax—Part 31—Waiver of exemption from social security tax by tax exempt organizations (Marcinko/Bromell—TLC-Koppelman).	T.D. published in FR on 10-16-79.
§ 3121(e); LR-36-78	Empl. Tax—Part 31—Employees of members of related groups of corporations (Social Security Amendments of 1977, § 314) (Murphy/Bromell—TLC-Shakow).	T.D. published in FR on 12-19-79.
§ 3402(a); LR-35-78	Empl. Tax—Part 31—Extension of temporary reduction of withholding of income tax at source § 5(a)(1), Pub. L. 94-164; Pub. L. 94-331; § 2(a)(1), Pub. L. 94-398; § 3(a)(1), Pub. L. 94-414; § 401 (d)(1), (e), Pub. L. 94-455) (Thompson/Coulter—TLC-Koppelman).	T.D. published in FR on 12-27-79.
§ 4041(k), 4081(c); LR-120-79	Exc. Tax—Part 48—Exemption from motor fuels excise tax for certain alcohol fuels (Energy Tax Act of 1978, § 221) (Waltuch/Smith—TLC-Copeland).	T.D. published in FR on 12-5-79.
§ 4084; LR-205-78	Exc. Tax—Part 48—Gas guzzler tax (Energy Tax Act of 1978, § 201) (Murphy/Woo—TLC-Copeland).	T.D. published in FR on 2-8-80.
§ 4941; EE-163-78	Foundation Excise Tax—Part 53—Disposition of private property under transition rules of TRA 1980, Extension of self-dealing transition rules for private foundations (TRA of 1978, §§ 1301, 1309) (Glass/Thrasher—TLC-O'Laughlin).	T.D. published in FR on 2-28-80.
§ 6013 (g), (h), 6401(b), 879, 6073(a); LR-244-78	Inc. Tax—Part 1—Income tax treatment of nonresident alien individuals who are married to citizens or residents of the U.S. (TRA 1978, § 1012; RA 1978, § 701(u) (15) & (16)) (Klein/Felton—ITC-Dolan).	T.D. published in FR on 1-31-80.
§ 6051; LR-72-79	Empl. Tax—Part 31—To permit employer to defer furnishing Forms W-2 on former employees until January 31 of the year after the year employment terminated (Cubeta/Dickinson—TLC—Roche).	T.D. published in FR on 11-29-79.
§ 6103(j)(1); LR-213-79	Proc. & Admin.—Part 404—Temporary Regulations—Disclosures of return information to and by the Bureau of the Census (Dickinson).	T.D. published in FR on 2-22-80.
§ 6103(n); LR-206-79	Proc. & Admin.—Part 404—Temporary Regulations—Disclosure of returns and return information by State tax agencies to third parties for State tax administration purposes (Dickinson).	T.D. published in FR on 1-21-80.
§ 6411(d); LR-46-79	Inc. Tax—Part 5—Temporary Regulations—Application for tentative refund of tax under claim of right (RA 1978, § 504) (Mull/Whedbee—TLC-Levinson).	T.D. published in FR on 2-7-80.
§ 6420, 6427; LR-15-79	Exc. Tax—Part 140—Temporary Regulations—Refunds to be made to aerial applicators in certain cases (Pub. L. 95-458, § 3) (Hartley/Smith—TLC-Copeland).	T.D. published in FR on 12-27-79.
§ 7216; LR-121-74	Proc. & Admin.—Part 301—To provide that the penalty under sec. 7216(a) shall not apply in the case of certain conflicts of interest (Bouknight/Saverude—TLC-Flynn).	T.D. published in FR on 2-21-80.
§ 7428; EE-66-79	Proc. & Admin.—Part 301—Declaratory judgments relating to status and classification of organizations (TRA 1978, § 1306(a)) (Kamikawa/McGovern—TLC-Koppelman).	Project closed without regulations on 1-28-80.
§ 7701; LR-205-79	Proc. & Admin.—Part 301—To exclude from the definition of income tax return preparers, volunteers under the Tax Counseling for the Elderly & VITA programs & organizations sponsoring or administering these programs (Yecies/Saverude).	T.D. published in FR on 2-21-80.
EE-128-79	Deletion from 26 CFR of sections reproducing statutory material Connor/Marget—TLC-O'Laughlin).	T.D. published in FR on 1-25-80.
LR-200-79	Statement of Procedural Rules—Title 26—Part 601—Counseling for the elderly (RA 1978, § 163) (Saverude).	SPR published in FR on 12-13-79.

Table of Abbreviations*Abbreviation and Meaning*

ACTS or TX—Office of Assistant Commissioner (Taxpayer Service and Returns Processing)
 adj.—adjustment
 admin.—administration
 amdmnt.—amendment
 appvd.—approved
 C or Comm'r. or Comm.—Office of Commissioner
 CC—Office of Chief Counsel
 CC:I—Office of Chief Counsel Interpretive Division
 co.—company
 corp.—corporation
 E or EPEO—Office of Assistant Commissioner (Employee Plans and Exempt Organizations)
 EE—Office of Chief Counsel, Employee Plans and Exempt Organizations Division
 EO—Exempt Organizations Division
 EP—Employee Plans Division
 ERISA—Employee Retirement Income Security Act
 est.—estate
 exc.—excise
 F.R.—Federal Register
 fwd.—forwarded
 govt.—government
 hrg.—hearing
 inc.—income
 ITC—Office of International Tax Counsel (Treasury)
 LR—Office of Chief Counsel, Legislation and Regulations Division
 mfr.—manufacturer
 misc.—miscellaneous
 org.—organization
 perm.—permanent
 P.L. or Pub. L.—Public Law
 P & R—Office of Assistant Commissioner (Planning and Research)
 prelim.—preliminary
 prep.—preparation
 proc.—procedure
 prop.—proposed
 prov.—provision
 pub.—published
 RA—Revenue Act
 rec'd.—received
 reg.—regulation
 repub.—republished

ret'd.—returned
 rtr.—retailer
 rev.—revenue, revised, or review (depending on context)
 sec. or §—section
 soc. sec.—social security
 subch.—subchapter
 T or Tech.—Office of Assistant Commissioner (Technical)
 T:C—Corporation Tax Division
 T.D.—Treasury decision
 temp.—temporary
 T:I—Individual Tax Division
 T:FP—Tax Forms and Publications Division
 TLC—Office of Tax Legislative Counsel (Treasury)
 T/P—Taxpayer
 TRA—Tax Reform Act
 Treas.—Department of the Treasury
 TR & SA—Tax Reduction & Simplification Act

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 Duffy, Donald K.—566-4336
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 Felton, Jason R.—566-3323
 Fischer, John M.—566-3336
 Flanagan, Harold—566-6631
 Francis, Paul A.—566-6640
 Grundeman, Fredric E.—566-3287
 Harman, John—566-6631
 Hartley, H. Benjamin—566-3287
 Horowitz, Daniel—566-3289
 Kissel, Benedetta A.—566-3458

Klein, Kenneth—566-3289
 Kusma, Kyllikki—566-3287
 Lanning, Geoffrey B. L.—566-3923
 Levine, Jack A.—566-3458
 MacMaster, John P.—566-3294
 Mantle, William E.—566-3909
 Marcinko, Leonard T.—566-3459
 Mix, Phoebe A.—566-3671
 Mull, Richard—566-3458
 Murphy, Eileen—566-3297
 Parcell, John H.—566-3288
 Renfroe, Diane L.—566-3289
 Rock, Gerald W.—566-3331
 Saverude, Charles C.—566-3394
 Schmalz, John—566-3432
 Schreiner, Kent J.—566-3289
 Small, Stephen J.—566-3287
 Smith, Larry E.—566-3287
 Stevenson, Donald W.—566-3516
 Swift, Carolyn—566-3458
 Thompson, Susan K.—566-3459
 Tolleris, John A.—566-3294
 Waltuch, Robert H.—566-3287
 Whedbee, Charles M.—566-3458
 Woo, Walter H.—566-3734
 Yecies, Mark L.—566-3458

Employee Plans and Exempt Organizations Division

Name and Telephone (Area Code 202)

Accettura, Paul G.—566-3422
 Baker, George B.—566-3422
 Beker, Harry—566-6212
 Cobb, Kevin W.—566-3430
 Gibbs, William D.—566-3430
 Glass, Margie—566-3544
 Greenblatt, Russell E.—566-3544
 Hennessy, Ellen A.—566-3430
 Hirsch, Leonard S.—566-3430
 Horowitz, Joel E.—566-6212
 Jelly, George H.—566-4551
 Kamikawa, Ray K.—566-3422
 Kerby, Charles K.—566-3422
 Maldonado, Kirk F.—566-3430
 Marget, Jonathan P.—566-3651
 McGovern, James J.—566-4173
 Misher, Norman J.—566-3430
 Rogan, Thomas F.—566-3544
 Stein, Elizabeth—566-3422
 Sumter, Thomas L.—566-6212
 Thrasher, Michael A.—566-3961
 Wickersham, Richard J.—566-3250

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