Internal Revenue Service

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Department of the Treasury
Washington, DC 20224

Third Party Communication: None
Date of Communication: Not Applicable

Person To Contact:
, ID No.
Telephone Number:

Refer Reply To:
CC:INTL:B04
PLR-150443-04

Date:
September 27, 2004

In Re:

PLR 9016021

TY:

Legend

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Dear :

This letter is in regards to the Private Letter Ruling, Project number INTL-729-89 dated January 18, 1990, which was issued by Associate Chief Counsel (International), Branch 6, to A which you represented.

Please be advised that the first ruling in the above referenced Private Letter Ruling, i.e., the ruling applying section 897 of the Code to the liquidating distributions, and the discussion related to that ruling, are being reconsidered, and therefore, are withdrawn. The revocation of the first ruling in the Private Letter Ruling and of the discussion related to the first ruling is being applied without retroactive effect.

This letter is being sent to you pursuant to the power of attorney which was submitted with the original ruling request.

This ruling is directed only to the taxpayer requesting it. Section 6110(k)(3) of the Code provides that it may not be used or cited as precedent.

Sincerely,

Charles P. Besecky
Chief, Branch 4
(International)