Publication 1078
Issue: 06/20/2003

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 Cousel advice.

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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.

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Department of the Treasury
Internal Revenue Service

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200215039 200226009

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200240038 200240038 200240038 200240038 200250006 200250007 200250008
200303032 200303032 200316030 200324050

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200203017 200205019 200206023 200206030 200206031 200208007 200210041
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200317004 200318020 200323013 200324027 200324028 200324029 200324030

• S Termination Year 1362.03-00
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200207015 200223052 200230030 200230030 200308033 200308033

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200205028 200240002 200240002 200240002 200240002 200247002 200320013 200320013

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200210041 200210042 200210045 200210046 200218033

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200207015 200223052 200230030 200230030

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200206044 200226037 200244013 200252027 200252027

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200203059 200220018 200238026 200238026 200238026 200303055 200303055 200312013 200312013 200312013 200312013 200312013 200312013

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200227001 200303056 200303056 200312015 200312015 200312015 200312015 200312015 200312015

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200203007 200210012 200235011 200235011

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200235011 200235011 200307077 200307077

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200210051 200223013 200223014 200314012

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200202033 200203029 200203030 200206045 200209022 200209033 200209034
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200217020 200218018 200220008 200220009 200221022 200221038 200221047
200222010 200224010 200224013 200225012 200226040 200230023 200230023
200230032 200230032 200231002 200231002 200233010 200233012 200236015
200236015 200236018 200236018 200237019 200239024 200239024 200239024
200247005 200247010 200247015 200247016 200247036 200302019 200302026
200304018 200304019 200308005 200308006 200308007 200308008 200308009
200308010 200308011 200308012 200308013 200308014 200308015 200308016
200308017 200308018 200308019 200308020 200308021 200308022 200308023
200308024 200308025 200308026 200308027 200308028 200308029 200308040
200321004 200251006 200251006 200251006 200252034 200252034 200252035
200252035 200252068 200252068 200252081 200252081 200301002 200301003
200301005 200301006 200301007 200302019 200302026 200303043 200303043
200306007 200306007 200307005 200307005 200307007 200307007 200307064
200307064 200307065 200307065 200307066 200307066 200307067 200307067
200307068 200307068 200308005 200308006 200308007 200308008 200308009
200308010 200308011 200308012 200308013 200308014 200308015 200308016
200308017 200308018 200308019 200308020 200308021 200308022 200308023
200308024 200308025 200308026 200308027 200308028 200308029 200308040
200310010 200310010 200310010 200312020 200312020 200312020 200312020
200312020 200312020 200312021 200312021 200312021 200312021 200312021
200312021 200314020 200316024 200316025 200316029 200318036 200320014
200320014 200323018

Section 9111 **Miscellaneous Legal Proceedings** **9111.00-00**

• Res Judicata 9111.14-00
200221002

• Collateral Estoppel 9111.19-00
200221002

• *Related Civil Action* *9111.19-02*
200206008 200221002

Section 9114 **Tax Conventions (See Also 894.01-00 through 894.12-00)** **9114.00-00**

• U.S. Model Income Tax Treaty 9114.01-00

• *Students and Trainees* *9114.01-20*
200251003 200251003 200251003

• U.S. Income Tax Treaties 9114.03-00

• *Ireland* *9114.03-19*
200216010 200236023 200236023 200238031 200238031 200238031 200239030
200239030 200239030 200243029 200321013 200252071 200252071 200301039
200323016

• *Japan* *9114.03-22*
200222011

• *Switzerland* *9114.03-38*
200201025 200201025 200224025

• *United Kingdom* *9114.03-42*
200225016

• *Czech Republic* *9114.03-43*
200251003 200251003 200251003

	• *Slovak Republic* 200251003 200251003 200251003	*9114.03-48*
Section 9214	**Leasing Shelter** 200218022 200224011 200227018	**9214.00-00**
	• Computer Leasing 200209001	9214.04-00
Section 9999	**Miscellaneous Issues** 200220001 200220002	**9999.00-00**
	• Substance v. Form Issues Not Contained in Present List 200226014	9999.97-00
	• Not Able to Identify Under Present List 200202063 200202070 200205045 200205046 200205047 200206001 200206002 200208025 200208026 200210001 200210032 200210063 200211007 200211045 200212031 200212032 200212033 200213007 200215050 200215052 200216026 200216028 200217005 200217017 200218014 200219035 200220006 200220026 200220027 200221001 200221045 200223018 200223051 200225003 200225034 200233002 200234004 200234004 200234004 200234004 200234055 200234055 200234055 200234055 200235024 200235024 200238002 200238002 200238002 200238043 200238043 200238043 200240023 200240023 200240023 200240023 200240037 200240037 200240037 200240037 200241017 200241017 200241017 200241020 200241020 200241020 200242003 200242006 200245052 200246002 200246002 200246002 200246030 200246030 200246030 200247025 200249001 200302018 200304009 200304029 200304030 200250001 200302018 200303009 200303009 200303047 200303047 200305003 200312002 200312002 200312002 200312002 200312002 200312002 200316001 200322001	9999.98-00