



Securities Industry Association

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June 13, 2000

The Honorable Charles O. Rossotti
Commissioner
Internal Revenue Service
Room 3000
1111 Constitution Avenue, N.W.
Washington, DC 20224

The Honorable Jonathan Talisman
Acting Assistant Secretary (Tax Policy)
United States Department of the Treasury
Room 1334 Main Treasury Building
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

Dear Sirs:

Enclosed are the comments of the Securities Industry Association concerning the new Treasury regulations requiring the registration of corporate tax shelters under section 6111(d) of the Internal Revenue Code and requiring the maintenance of lists of investors in potentially abusive tax shelters under section 6112 of the Code. We look forward to working with you in the development of effective and administrable rules.

Once again, thank you for your consideration of our views. Please do not hesitate to contact either one of us, or call Patti McClanahan, SIA's Vice President and Director for Tax Policy (202-326-5324), if we can be of help in any way.

Sincerely,

Saul M. Rosen
Chair, SIA's Committee on Federal Taxation

Marc E. Lackritz
President

of the Securities Industry
Association

Securities Industry

cc: Eric Solomon
Joe Mikrut
Rita Cavanagh
Stuart Brown
Richard Skillman
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