

MEMO# 5571

February 9, 1994

FIFTH INSTITUTE PFIC SURVEY

February 9, 1994 TO: ACCOUNTING/TREASURERS COMMITTEE NO. 7-94 INTERNATIONAL COMMITTEE NO. 1-94 TAX COMMITTEE NO. 6-94 RE: FIFTH INSTITUTE PFIC SURVEY

_____ As you know, the Institute has undertaken to collect and disseminate information from its members that may be useful in identifying passive foreign investment companies ("PFICs"). As part of that effort, the Institute periodically surveys its members and updates the list of PFICs which the members have provided. Attached is a copy of the last PFIC survey update, dated April 2, 1993. Please review the update and make any deletions, additions or corrections to the PFIC listing that you feel necessary, either by marking up the PFIC update or in a short memorandum. Please return the results to Betsy Teter, the Department's Legal Assistant, by mail or by fax (202-326-5839) no later than March 11, 1994. The Institute then will send out a new listing. * * * * Thank you very much for your cooperation in this important survey. If you have any questions, please call Betsy Teter (at 202-326-5838) or me (at 202-326-5832). We will keep you informed of developments. Keith D. Lawson Associate Counsel - Tax Attachment

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