

MEMO# 10529

December 3, 1998

INSTITUTE FILES COMMENT LETTER ON ROTH IRA GUIDANCE

[10529] December 3, 1998 TO: PENSION COMMITTEE No. 82-98 PENSION OPERATIONS ADVISORY COMMITTEE No. 67-98 TRANSFER AGENT ADVISORY COMMITTEE No. 81-98 AD HOC COMMITTEE ON ROTH IRA OCTOBER 22 ROTH IRA MEETING ATTENDEES RE: INSTITUTE FILES COMMENT LETTER ON ROTH IRA GUIDANCE

The Institute has filed a comment letter on the proposed regulations with respect to Roth IRA issues and Internal Revenue Service Notices 98-49 and 98-50. With respect to Notice 98-49, the Institute commented on the following issues: recharacterization transaction reporting requirements, Internal Revenue Service reporting alternatives for recharacterization transactions, Service-approved Roth IRA documents and reporting conversion transactions involving withholding. With respect to Notice 98-50, the Institute requested guidance on the issue of partial recharacterizations. Finally, with respect to the proposed regulations, the Institute requested clarification on the following issues: recharacterization by beneficiaries, withholding rules applicable to recharacterizations, minimum required distributions and the surviving spouse, decedents who die during the 4-year spread for 1998 conversions and conversions of SIMPLE IRAs. A copy of the comment letter is attached. Kathryn Ricard
Assistant Counsel Attachment

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