

MEMO# 3494

February 7, 1992

PRIVATE LETTER RULING ON ROLLOVER OF LUMP SUM DISTRIBUTION DESPITE EARLIER RECEIPT OF REQUIRED MINIMUM DISTRIBUTIONS

February 7, 1992 TO: PENSION COMMITTEE NO. 9-92 RE: PRIVATE LETTER RULING ON ROLLOVER OF LUMP SUM DISTRIBUTION DESPITE EARLIER RECEIPT OF REQUIRED MINIMUM DISTRIBUTIONS _____ In attached Private Letter Ruling 9143078, an employee who received required minimum distributions from qualified retirement plans after reaching age 70 1/2, but while still employed by the plans' sponsor, was permitted to treat the distribution of the remaining account balances in the plans upon retirement as lump- sum distributions that could be rolled over into an IRA. The amount eligible for rollover treatment was required to be reduced, however, by the required minimum distributions and by any nondeductible employee contributions made to the plans. We will keep you informed of further developments. David J. Mangefrida Jr.
Assistant Counsel - Tax Attachment DJM:bmb