



OFFICE OF  
CHIEF COUNSEL

DEPARTMENT OF THE TREASURY  
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CAM-101544-97

MEMORANDUM FOR DISTRICT DIRECTOR, INDIANA DISTRICT  
Attn: Chief, Examination Division

FROM: Charles B. Ramsey, Branch 6, Office of Associate Chief  
Counsel (Passthroughs & Special Industries)  
(CC:PSI:6)

SUBJECT: Withdrawal of Application for Change in Method of  
Accounting

In accordance with section 8.07(2)(a) of Rev. Proc. 2000-1, 2000-1 I.R.B. 4, 33, this memorandum advises you that a taxpayer within your district has withdrawn its Form 3115, Application for Change in Accounting Method. This document is not to be used or cited as precedent.

### DISCLOSURE STATEMENT

This memorandum is Chief Counsel Advice and is open to public inspection pursuant to the provisions of § 6110(i) of the Internal Revenue Code. The provisions of § 6110 require the Internal Revenue Service to remove taxpayer identifying information and provide the taxpayer with notice of intention to disclose before it is made available for public inspection. Section 6110(c) and (i). Section 6110(i)(3)(B) also authorizes the Service to delete information from this memorandum that is protected from disclosure under 5 U.S.C. § 552 (b) and (c) before the document is provided to the taxpayer with notice of intention to disclose. Only the National Office function issuing this memorandum is authorized to make such deletions and to make the redacted document available for public inspection. **Accordingly, the Examination, Appeals, or Counsel recipient of this document may not provide a copy of this unredacted document to the taxpayer or their representative.** The recipient of this document may share this unredacted document only with those persons whose official tax administration duties with respect to the case and the issues discussed in the document require inspection or disclosure of this memorandum.

CAM-101544-97

LEGEND:

B =

C =

This memorandum advises you that a Form 3115, dated C, and filed by B, is withdrawn. B withdrew the Form 3115 after we developed our tentatively adverse position.

B is presently expensing the costs associate with its Indy racers. B proposed to depreciate these assets under asset class 00.22 Automobiles, Taxis of Rev. Proc 87-56. Because the vehicles are not passenger automobiles, we tentatively concluded that the proper classification for these vehicles is under asset class 79.0 Recreation. Asset class 79.0 includes assets used in the provision of entertainment services on payment of a fee or admission charge.

If you have any questions on this matter, do not hesitate to call (202) 622-3110.

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Charles B. Ramsey

cc: