Additional Disaster Relief for Taxpayers on Account of the September 11, 2001, Terrorist Attack

Notice 2001–63

The Treasury Department and the Internal Revenue Service recognize that the continuing disruption to the nation’s financial markets, transportation system, and telecommunication and computer networks, and continuing security concerns have made it difficult for many taxpayers to meet their September 17, 2001, filing and payment requirements, and for their representatives to assist them in doing so. This notice provides additional tax relief under sections 6081, 6161, and 7508A for taxpayers who, regardless of their location, are continuing to experience difficulties in meeting their filing and tax payment requirements on account of events related to the September 11, 2001, terrorist attack. The Internal Revenue Service has determined that the due date for all federal tax obligations falling between September 10, 2001, and September 24, 2001, is postponed to September 24, 2001. This postponement of time covers the filing of returns and claims for refund, the payment of tax (including estimated tax payments), making elections, and filing any other federal tax documents. The postponement does not apply to deposits of federal taxes. For relief with respect to deposits of federal taxes, see Notice 2001–61 on page 305 of this Bulletin and IRS News Release IR-2001–79.

The relief provided by this notice is in addition to the relief provided in Notice 2001–61 and IRS News Release IR-2001–79.

DRAFTING INFORMATION

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26 CFR 601.105: Examination of returns and claims for refund, credit, or abatement; determination of correct tax liability.


SECTION 1. PURPOSE

This revenue procedure provides the domestic asset/liability percentages and domestic investment yields needed by foreign life insurance companies and foreign property and liability insurance companies to compute their minimum effectively connected net investment income under section 842(b) of the Internal Revenue Code for taxable years beginning after December 31, 1999. Instructions are provided for computing foreign insurance companies’ liabilities for the estimated tax and installment payments of estimated tax for taxable years beginning after December 31, 1999. For more specific guidance regarding the computation of the amount of net investment income to be included by a foreign insurance company on its U.S. income tax return, see Notice 89–96 (1989–2 C.B. 417).


SECTION 2. CHANGES

.01 DOMESTIC ASSET/LIABILITY PERCENTAGES FOR 2000. The Secretary determines the domestic asset/liability percentage separately for life insurance companies and property and liability insurance companies. For the first taxable year beginning after December 31, 1999, the relevant domestic asset/liability percentages are:

114.2 percent for foreign life insurance companies, and

201.6 percent for foreign property and liability insurance companies.

.02 DOMESTIC INVESTMENT YIELDS FOR 2000. The Secretary is required to prescribe separate domestic investment yields for foreign life insurance companies and for foreign property and liability insurance companies. For the first taxable year beginning after December 31, 1999, the relevant domestic investment yields are:

8.2 percent for foreign life insurance companies, and

5.6 percent for foreign property and liability insurance companies.

.03 SOURCE OF DATA FOR 2000. The section 842(b) percentages to be used for the 2000 tax year are based on tax return data following the same methodology used for the 1999 year.

SECTION 3. APPLICATION — ESTIMATED TAXES

To compute estimated tax and the installment payments of estimated tax due