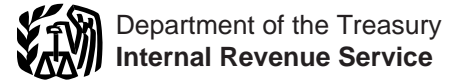


Instructions for Form 3115

(Rev. May 2006)



(Use with the December 2003 revision of Form 3115) Application for Change in Accounting Method

Section references are to the Internal Revenue Code unless otherwise noted.

All references to Rev. Proc. 97-27 are to Rev. Proc. 97-27, 1997-21 I.R.B. 10 (as modified and amplified by Rev. Proc. 2002-19, 2002-13 I.R.B. 696, as amplified and clarified by Rev. Proc. 2002-54, 2002-35 I.R.B. 432), or its successor.

All references to Rev. Proc. 2002-9 are to Rev. Proc. 2002-9, 2002-3 I.R.B. 327 (as modified and clarified by Announcement 2002-17, 2002-8 I.R.B. 561, modified and amplified by Rev. Proc. 2002-19, and amplified, clarified and modified by Rev. Proc. 2002-54), or its successor.

All references to Rev. Proc. 2006-1 are to Rev. Proc. 2006-1, 2006-1 I.R.B. 1, or its successor.

General Instructions

Purpose of Form

File Form 3115 to request a change in either an overall accounting method or the accounting treatment of any item. File a separate Form 3115 for each unrelated item or submethod, unless the IRS specifically permits (in published guidance) a change for more than one unrelated item or submethod to be requested on a single Form 3115.

Two procedures exist under which an applicant may request a change in accounting method:

Automatic Change Request. Unless otherwise provided in published guidance, you **must** file under the automatic change request procedures if (a) the accounting method change is included in those procedures for the requested year of change, and (b) you are within the scope of those procedures for the requested year of change (see **Automatic Change Request Scope Limitations** on page 4). A Form 3115 filed under these procedures may be reviewed by the IRS and you will be notified if information in addition to that requested on Form 3115 is required or if your request is denied. No user fee is required. An applicant that timely files and complies with an automatic change request procedure is granted consent to change its accounting method, subject to review by the IRS National Office and operating division director. See the instructions for Part I on page 4 for more information and the **List of Automatic Accounting Method Changes** beginning on page 9.

Advance Consent Request. If you are not within the scope of the automatic change request procedures for the requested year of change or the accounting method change you are requesting is not included in those procedures for the requested year of change, you may be able to file under the advance consent request procedures (see **Advance Consent Request Scope Limitations** on page 6). If the requested change is approved, the filer will receive a letter ruling on the requested change. A taxpayer may not take an advance consent change in accounting method into account in any federal income tax return until the taxpayer receives the letter ruling granting permission to make the accounting method change and the taxpayer signs and returns the Consent Agreement copy of that letter ruling. See Regulations section 1.446-1(e)(2)(i) and

section 9.17 of Rev. Proc. 2006-1. A user fee is required. See the instructions for Part III on page 6 for more information.

For general rules on changing an accounting method under:

Automatic change request procedures . . .	See Rev. Proc. 2002-9, as modified by Announcement 2002-17, Rev. Proc. 2002-19, and Rev. Proc. 2002-54.
Advance consent request procedures . . .	See Rev. Proc. 97-27, as modified by Rev. Proc. 2002-19 and Rev. Proc. 2002-54.

For more information, see Rev. Proc. 2006-1, particularly section 9.

When filing Form 3115, applicants must determine if the IRS has published an accounting method revenue procedure, revenue ruling, notice, regulation, or other published guidance relating to the specific method the applicant is requesting to change. This guidance is published in the Internal Revenue Bulletin. For years after 1995, Internal Revenue Bulletins are available at www.irs.gov.

For more information, see **Pub. 538**, Accounting Periods and Methods.

Who Must File

Generally, a Form 3115 must be filed by or on behalf of each applicant seeking consent to change an accounting method. An "applicant" is a taxpayer or a separate and distinct trade or business of a taxpayer (for purposes of Regulations section 1.446-1(d)), including a qualified subchapter S subsidiary (QSUB) or a single-member limited liability company (single-member LLC), whose accounting method is being changed.

For a consolidated group of corporations, the parent corporation must file the Form 3115 for a change in accounting method for itself or any member of the consolidated group. For a controlled foreign corporation (CFC) or 10/50 corporation without a U.S. trade or business, the Form 3115 must be filed, respectively, by the controlling U.S. shareholder(s) or majority domestic corporate shareholder(s). If the U.S. shareholder(s) is a member of a consolidated group, the parent corporation must file Form 3115 for the U.S. shareholder on behalf of the foreign corporation.

Generally, a separate Form 3115 must be filed for each applicant that is part of a related group of corporations or that is a separate and distinct trade or business of a taxpayer, including a QSUB or single-member LLC. However, a single Form 3115 may be filed for multiple applicants in the following situations.

1. A taxpayer requesting an **identical** accounting method change for two or more separate and distinct trades or businesses (for purposes of Regulations section 1.446-1(d)) of that taxpayer, including a QSUB or single-member LLC;
2. A common parent of a consolidated group requesting an **identical** accounting method change on behalf of two or more members of the consolidated group;

3. A common parent of a consolidated group requesting an **identical** accounting method change on behalf of two or more CFCs that do not engage in a trade or business within the United States where all controlling U.S. shareholders of the CFCs are members of the consolidated group; or

4. A taxpayer requesting an **identical** accounting method change on behalf of two or more CFCs that do not engage in a trade or business within the United States for which the taxpayer is the sole controlling U.S. shareholder of the CFCs.

See section 15.07(4) of Rev. Proc. 2006-1 for what is an identical accounting method change.

When and Where To File

Automatic change requests. A Form 3115 that is filed under the automatic change request procedures is filed in duplicate. The **original** must be attached to the filer's timely filed (including extensions) federal income tax return for the year of change. A **copy** of the Form 3115 must be filed with the IRS National Office (see below) no earlier than the first day of the year of change and no later than when the original is filed with the federal income tax return for the year of change. See also **Late Application** below and the instructions for lines 4d and 4e on page 5.

Advance consent requests. A Form 3115 that is filed under the advance consent request procedures must be filed during the tax year for which the change is requested. If the tax year is a short period, file Form 3115 by the last day of the short tax year. File the Form 3115 with the IRS National Office (see below). Form 3115 should be filed as early as possible during the year of change to provide adequate time for the IRS to respond prior to the due date of the filer's return for the year of change. See also **Late Application** below and the instructions for lines 4d and 4e on page 5.

File Form 3115 at the applicable IRS address listed below.

	For applicants (other than exempt organizations) filing . . .	
	An advance consent request	The National Office copy of an automatic change request
Delivery by mail	Internal Revenue Service Attn: CC:PA:LPD:DRU P.O. Box 7604 Ben Franklin Station Washington, DC 20044	Internal Revenue Service Attn: CC:PA:LPD:DRU (Automatic Rulings Branch) P.O. Box 7604 Ben Franklin Station Washington, DC 20044
Delivery by private delivery service	Internal Revenue Service Attn: CC:PA:LPD:DRU Room 5336 1111 Constitution Ave., NW Washington, DC 20224	Internal Revenue Service Attn: CC:PA:LPD:DRU (Automatic Rulings Branch) Room 5336 1111 Constitution Ave., NW Washington, DC 20224

For exempt organizations filing an advance consent request or the National Office copy of an automatic change request . . .

By mail	By private delivery service . . .
Internal Revenue Service Tax Exempt & Government Entities Attn: TEGE:EO P.O. Box 27720 McPherson Station Washington, DC 20038	Internal Revenue Service Tax Exempt & Government Entities Attn: TEGE:EO 1750 Pennsylvania Ave., NW Washington, DC 20038

The IRS normally acknowledges receipt of a filed Form 3115 for an advance consent request within 60 days after receipt. If

an acknowledgement has not been received within 60 days of filing Form 3115, the filer of an advance consent request can inquire to: Internal Revenue Service, Control Clerk, CC:IT&A, Room 4516, 1111 Constitution Ave., NW, Washington, DC 20224.

Note: The IRS does not send acknowledgements for automatic change requests.

Late Application

In general, a taxpayer that fails to timely file a Form 3115 will not be granted an extension of time to file except in unusual and compelling circumstances. See Regulations section 301.9100-3 for the standards that must be met. For information on the period of limitations, see section 5.03(2) of Rev. Proc. 2006-1.

However, a limited 6-month extension of time to file Form 3115 is sometimes available for automatic change requests. For details, see section 6.02(3)(b) of Rev. Proc. 2002-9 and Regulations section 301.9100-2.

A taxpayer submitting a ruling request for an extension of time to file Form 3115 must pay a user fee for its extension request and, in the case of an advance consent request, also a separate user fee for its accounting method change request. For the schedule of user fees, see (A)(3)(b) and (A)(5)(d) in Appendix A of Rev. Proc. 2006-1.

Specific Instructions

Name(s) and Signature(s)

Enter the name of the filer on the first line of page 1 of Form 3115. In the case of an advance consent request, the Form 3115 and any attached statements required to be signed must be signed and dated by, or on behalf of, the filer. In the case of an automatic consent request, the copy of the Form 3115 that is sent to the IRS National Office must be signed and dated by, or on behalf of, the filer; the Form 3115 attached to the income tax return (including any additional statements) does not need to be signed. The name and signature requirements are discussed below.

In general, the filer of the Form 3115 is the applicant. However, for certain corporations discussed in the following paragraphs, Form 3115 is filed on behalf of the applicant. If such an exception applies, enter the filer's name and identification number on the first line of Form 3115 and enter the applicant's name and identification number on the fourth line. If Form 3115 is filed for multiple applicants in a consolidated group of corporations, multiple controlled foreign corporations (CFCs), or multiple separate and distinct trades or businesses of a taxpayer (including QSUBs or single-member LLCs), attach a schedule listing each applicant and its identification number (where applicable). This schedule may be combined with the information requested for Part III, line 23a (regarding the user fee) and Part IV (section 481(a) adjustment). If multiple names and signatures are required (for example, in the case of CFCs—see instructions on page 3), attach a schedule labeled "SIGNATURE ATTACHMENT" to the Form 3115, signed under penalties of perjury using the same language as in the declaration on page 1 of Form 3115. Receivers, trustees, or assignees must sign any Form 3115 they are required to file.

Individuals. If Form 3115 is filed for a husband and wife who file a joint income tax return, enter the names of both on the first line and the signatures of both on the signature line.

Partnerships. Enter the name of the partnership on the first line of Form 3115. In the signature section of Form 3115, enter the signature of one of the general partners or limited liability

company members authorized to sign and that person's name and title below the signature.

Corporations, personal service corporations, S corporations, cooperatives, and insurance companies.

Enter the name of the filer on the first line of Form 3115. In the signature section of Form 3115, enter the signature of the officer authorized to sign and the officer's name and title below the signature.

Consolidated group of corporations. Enter the name of the parent corporation on the first line of Form 3115. Also enter the name(s) of the applicant(s) on the fourth line of Form 3115 if a member of the consolidated group other than, or in addition to, the parent corporation is requesting an accounting method change. Only an officer authorized to sign for the parent corporation may sign Form 3115.

Controlled foreign corporations (CFCs). For a CFC with a U.S. trade or business, use the same rules as other corporations. For a CFC that does not have a U.S. trade or business, enter the name(s) of the controlling U.S. shareholder(s) of the CFC on the first line of Form 3115 and the name of the CFC on the fourth line. All of the controlling U.S. shareholders must sign Form 3115.

However, if any controlling U.S. shareholder is a member of a consolidated group, enter the name of the shareholder's parent corporation rather than the shareholder's name on the first line of Form 3115. A person authorized to sign for the shareholder's parent corporation must sign Form 3115.

10/50 corporations. For a 10/50 corporation with a U.S. trade or business, use the same rules as other corporations. For a 10/50 corporation that does not have a U.S. trade or business, enter the name(s) of the majority domestic corporate shareholder(s) on the first line of Form 3115 and the name of the 10/50 corporation on the fourth line. A person authorized to sign for each of the majority domestic corporate shareholders must sign Form 3115.

However, if any majority domestic corporate shareholder is a member of a consolidated group, enter the name of the shareholder's parent corporation rather than the shareholder's name on the first line of Form 3115. A person authorized to sign for the shareholder's parent corporation must sign Form 3115.

Estates or trusts. Enter the name of the estate or trust on the first line of Form 3115. In the signature section of Form 3115, enter the signature of the fiduciary, personal representative, executor, administrator, etc., having legal authority to sign and that person's name and official title below the signature.

Exempt organizations. Enter the name of the organization on the first line of Form 3115. In the signature section of Form 3115 enter the signature of a principal officer or other person authorized to sign and that person's name and official title below the signature.

Preparer (other than filer/applicant). If the individual preparing the Form 3115 is not the filer or applicant, the preparer also must sign. However, in the case of an automatic change request, the Form 3115 attached to the income tax return does not need to be signed.

Identification Number

Enter the filer's taxpayer identification number on the first line of Form 3115.

Individuals enter their social security number (SSN) (or individual taxpayer identification number (ITIN) for a resident or nonresident alien). If the Form 3115 is for a husband and wife who file a joint return, enter the identification numbers of both.

For all others, enter the employer identification number (EIN).

For a consolidated group of corporations enter the EIN of the parent corporation on the first line of Form 3115. Enter the EIN

of the applicant on the fourth line if a member of the consolidated group other than, or in addition to, the parent corporation is requesting the accounting method change.

If Form 3115 is filed on behalf of a CFC or 10/50 corporation, and the foreign corporation does not have an EIN, it does not have to obtain one. Instead, enter "N/A" next to the CFC's or 10/50 corporation's name on the fourth line.

Principal Business Activity Code

If the filer is a business, enter the six-digit principal business activity (PBA) code of the filer. The principal business activity of the filer is the one generating the largest percentage of its total receipts. The PBA code is based on the North American Industry Classification System (NAICS) codes. See the instructions for the income tax return of the filer for the filer's PBA code and definition of "total receipts."

Note: An applicant requesting to change its accounting method under designated automatic accounting method change numbers **33** and/or **51** in the **List of Automatic Accounting Method Changes** beginning on page 9 must attach a schedule to the Form 3115 listing the detailed NAICS code associated with the applicant's principal business activity. See Rev. Proc. 2002-28, 2002-18 I.R.B. 815, for further guidance.

Address

Include the suite, room, or other unit number after the street address. If the Post Office does not deliver mail to the street address and the filer has a P.O. box, show the box number instead of the street address.

Contact Person

The contact person must be an individual authorized to sign Form 3115, or the filer's authorized representative. If this person is someone other than an individual authorized to sign Form 3115, you must attach **Form 2848**, Power of Attorney and Declaration of Representative.

An individual authorized to represent the filer before the IRS, to receive a copy of the requested letter ruling, or to perform any other act(s), must properly reflect the authorization on Form 2848. For further details for an authorized representative and a power of attorney, see section 9.03(8) and (9) of Rev. Proc. 2006-1.

Note: A filer that wants to receive correspondence regarding its Form 3115 (for example, additional information letters or the letter ruling) by fax must attach to the Form 3115 a statement requesting this service. The attachment must also list the authorized name(s) and fax number(s) of the person(s) who are to receive the fax. The person(s) must be authorized to sign Form 3115 or an authorized representative of the filer that is included on Form 2848. For further details on the fax procedures, see section 9.04(3) of Rev. Proc. 2006-1.

Type of Accounting Method Change Requested

Check the appropriate box described below indicating the type of change being requested.

• **Depreciation or amortization.** Check this box for a change in the **(a)** computation of depreciation or amortization (for example, the depreciation method or recovery period), **(b)** treatment of salvage proceeds or costs of removal, **(c)** method of accounting for retirements of depreciable property, or **(d)** treatment of depreciable property from a single asset account to a multiple asset account (pooling), or vice versa.

• **Financial products and/or financial activities of financial institutions.** Check this box for a change in the treatment of a financial product (for example, accounting for debt instruments, derivatives, mark-to-market accounting, etc.), or in the financial

activities of a financial institution (for example, a lending institution, a regulated investment company, a real estate investment trust, a real estate mortgage investment conduit, etc.).

• **Other.** For advance consent requests, check this box if neither of the above boxes applies to the requested change. State the type of method change being requested and, in the space provided, enter a short description of the change (for example, LIFO to FIFO, change within section 263A costs, deduction of warranty expenses, changes to the completed contract method for long-term contracts, etc.). For automatic change requests, this informational requirement is satisfied by properly completing Part I, line 1 of Form 3115.



Follow the instructions below to correctly complete Form 3115.

- Applicants requesting to change an accounting method using the automatic change request procedures must complete Parts I, II, and IV.
- Applicants requesting a change to an accounting method using the advance consent request procedures must complete Parts II, III, and IV.
- **All** applicants must complete Schedules A, B, C, D, and E, as applicable, for the change in accounting method requested.
- Attachments submitted with Form 3115 must show the filer's name and identification number. Also, indicate that the information is an attachment to Form 3115.
- Report amounts in U.S. dollars, translated, if necessary, from functional currency with a statement of exchange rates used.
- If more room is needed to respond to any line, attach a schedule labeled with the line number providing the applicable information.

Part I—Information For Automatic Change Request

Automatic Change Request Scope Limitations

An applicant may not be eligible to use the automatic change request procedures with respect to an automatic change provided by Rev. Proc. 2002-9 (either in the Appendix or included by reference in other published guidance) if any of the following six scope limitations (section 4.02 of Rev. Proc. 2002-9 as modified by Rev. Proc. 2002-19) apply at the time the copy of the Form 3115 would be filed with the IRS National Office **and** if any of the scope limitations are applicable to the requested automatic accounting method change as described in the applicable section of the Appendix of Rev. Proc. 2002-9 or other published guidance.

1. The applicant is under examination, except as provided in section 4.02(1) of Rev. Proc. 2002-9.
2. The applicant is (or was formerly) a member of a consolidated group that is under examination, or before an Appeals office, or before a Federal court for the tax year(s) the applicant was a member of the group. For more information, see section 4.02(4) of Rev. Proc. 2002-9.
3. In the case of a partnership or S corporation, the accounting method the applicant is requesting to change is an issue under consideration in an examination, or by an Appeals office, or before a Federal court with respect to a partner, member, or shareholder of the applicant. For more information, see section 4.02(5) of Rev. Proc. 2002-9.
4. The applicant made or applied to make the same change in accounting method within the last 5 tax years, including the year of change. For more information, see section 4.02(6) of Rev. Proc. 2002-9.

5. The applicant engages in a transaction to which section 381(a) applies within the proposed tax year of change. For more information, including exceptions to this limitation, see section 4.02(7) of Rev. Proc. 2002-9.

6. The applicant is in the final tax year of its trade or business as described in sections 4.02(8) and 5.04(3)(c) of Rev. Proc. 2002-9.

Line 1. Enter the designated automatic accounting method change number on line 1(a). These numbers may be found in the **List of Automatic Accounting Method Changes** beginning on page 9, or in subsequently published guidance. In general, enter a number for only one change. However, in certain limited circumstances, the numbers for two changes may be entered on line 1(a). The **List of Automatic Accounting Method Changes** specifies which requests for change in accounting method may be made with another request for change.

If the accounting method change is not included in the **List of Automatic Accounting Method Changes** or assigned a number in the published guidance providing the automatic accounting method change, the filer should check the box for line 1(b) and identify the revenue procedure or other published guidance under which the accounting method change is being requested.

Filers who properly complete line 1 have fulfilled the label requirements of section 6.02(4)(a) of Rev. Proc. 2002-9 and any similar requirements in other guidance.

Line 2. An applicant filing under the automatic change request procedures should review the applicable accounting method change section in the Appendix of Rev. Proc. 2002-9, or the procedures in other published guidance, if applicable, to determine if the scope limitations of section 4.02 of Rev. Proc. 2002-9, as modified by Rev. Proc. 2002-19, are inapplicable to the specific change in accounting method requested.

Line 2 is asking whether the scope limitations **do not** apply to the **accounting method change** being requested. By answering "Yes" on line 2, the applicant is stating that the Appendix of Rev. Proc. 2002-9 or the procedures in other published guidance specifically state that the scope limitations are not applicable to the requested accounting method change. However, the applicant must complete all the lines in Part II, Information For All Requests. If any of the scope limitations apply to the requested accounting method change **and** apply to the applicant, the applicant may not request an automatic accounting method change. However, the applicant may be eligible to request its change under the advance consent request procedures. See **Part III—Information For Advance Consent Request** on page 6 of these instructions to determine if these procedures apply to the applicant. The descriptions of the automatic changes in the **List of Automatic Accounting Method Changes** indicate whether, with respect to a particular change, scope limitations may not apply. Refer to section 4 of Rev. Proc. 2002-9, as modified by Rev. Proc. 2002-19, for specific requirements regarding scope limitations.

Line 3. If the applicant would be required by section 5.04(3)(c) of Rev. Proc. 2002-9 to take the entire amount of the section 481(a) adjustment into account in computing taxable income for the year of change, and if section 4.02(8) of Rev. Proc. 2002-9 applies to the applicant's accounting method change request, the applicant is not eligible to make the change under automatic change request procedures.

Part II—Information For All Requests

Note: For lines 4a, 4b, 4c, 5a, 5c, and 6, the reference to "applicant" includes the applicant and any present or former consolidated group in which the applicant was a member during the applicable tax year(s). A reference to "applicable tax

year(s)” includes any tax years for which the applicant’s present or former consolidated group is under examination, before an Appeals office, and/or before a Federal court if the applicant was a member of the group in those tax years. For each of the applicable lines (4a, 4b, 4c, 5a, 5c, and/or 6), attach to the Form 3115 a list of the beginning and ending dates of the tax year(s) that the applicant (including its present and former consolidated group) is under examination, before an Appeals office, and/or before a Federal court. If the method of accounting the applicant is requesting to change is an issue either under consideration, placed in suspense, or pending for any tax year under examination, or if the method of accounting the applicant is requesting to change is an issue under consideration by an Appeals office or by a Federal court, indicate the applicable tax year(s).

Line 4a. The applicant is under examination if it has a federal income tax return under examination on the date the Form 3115 is filed. For the definition of “under examination,” see section 3.07 of Rev. Proc. 97-27 or section 3.08 of Rev. Proc. 2002-9, both as modified by Rev. Proc. 2002-19, as applicable.

Line 4b. The applicant’s method of accounting is an issue under consideration if the applicant receives written notification from the examining agent specifically citing the treatment of the item as an issue under consideration. For further details, see section 3.08 of Rev. Proc. 97-27 or section 3.09 of Rev. Proc. 2002-9, as applicable. The applicant’s method of accounting is an issue placed in suspense if the examining agent has given the applicant written notification that the issue is placed in suspense.

Line 4c. The applicant’s method of accounting is an issue pending if the IRS has given the applicant written notification indicating that an adjustment is being made or will be proposed with respect to the applicant’s method of accounting for the tax year(s) under examination. Attach a copy of this written notification to Form 3115. For further details, see section 6.01(5) of Rev. Proc. 97-27 or section 6.03(6) of Rev. Proc. 2002-9, both as modified by Rev. Proc. 2002-19, as applicable.

Line 4d. A taxpayer under examination may request to change an accounting method if the operating division director consents to the filing of the Form 3115. The operating division director will consent to the filing of the Form 3115 unless, in the opinion of the operating division director, the method of accounting to be changed would ordinarily be included as an item of adjustment in the year(s) for which the applicant is under examination. The applicant should submit its request for the consent of the operating division director to the examining agent. If the operating division director consents to the filing of the Form 3115, the consent must be attached to the Form 3115 filed with the IRS National Office. Also, the applicant must submit the operating division director copy of Form 3115 to the examining agent at the same time the Form 3115 is filed with the IRS National Office. For applicants filing under the automatic change request procedures, attach to the Form 3115 submitted with the filer’s income tax return a written statement certifying that (a) the written consent was obtained from the director and (b) the applicant will retain a copy of the consent for inspection by the IRS. For further details, see section 6.01(4) of Rev. Proc. 97-27 or section 6.03(4) of Rev. Proc. 2002-9, as applicable.

Line 4e. The following exceptions apply to the “under examination” scope limitations:

- **90-day window period.** This exception applies during the first 90 days of any tax year if the applicant has been under examination for at least 12 consecutive months as of the first day of the tax year. The 90-day window period exception does not apply if the method the applicant is requesting to change is an issue under consideration or placed in suspense by the examining agent. For further details, including the required

statement, see section 6.01(2) of Rev. Proc. 97-27 or 6.03(2) of Rev. Proc. 2002-9, as applicable.

- **120-day window period.** This exception applies during the 120-day period following the date an examination ends regardless of whether a subsequent examination has commenced. For the definition of when an examination ends, see section 3.07 of Rev. Proc. 97-27 or section 3.08 of Rev. Proc. 2002-9, as applicable. The 120-day window period exception does not apply if the method the applicant is requesting to change is an issue under consideration or placed in suspense by the examining agent. Applicants should include the ending date of the examination that qualifies the applicant to file under the 120-day window. For further details, including the required statement, see section 6.01(3) of Rev. Proc. 97-27 or section 6.03(3) of Rev. Proc. 2002-9, as applicable.

Line 5a. If the applicant has any federal income tax return before an Appeals office and/or a Federal court, refer to sections 6.02 and 6.03 of Rev. Proc. 97-27 or sections 6.04 and 6.05 of Rev. Proc. 2002-9, both as modified by Rev. Proc. 2002-19, as applicable.

Line 5c. Except as otherwise provided in published guidance, an applicant that is requesting to change a method of accounting that is an issue under consideration by an Appeals office and/or a Federal court will not receive audit protection for the requested change. For further details, see sections 6.02 and 6.03 of Rev. Proc. 97-27 or 6.04 and 6.05 of Rev. Proc. 2002-9, both as modified by Rev. Proc. 2002-19, as applicable.

Line 6. The information requested on line 6 may be provided in an attachment that includes the information requested on line 4f and/or line 5a, as applicable.

Line 8. Indicate the lack of audit protection by checking the “Yes” box. An applicant filing under the automatic change request procedures should review the applicable accounting method change section in the Appendix of Rev. Proc. 2002-9, or the procedures in other published guidance, if applicable, to determine if, under the specific change in accounting method requested, the applicant will not receive audit protection in connection with the change. Applicants filing under either the automatic change or advance consent request procedures must also indicate lack of audit protection for their change if audit protection does not apply under the provisions of sections 6.01(5), 6.02, or 6.03 of Rev. Proc. 97-27, or under sections 6.03(6), 6.04, or 6.05 of Rev. Proc. 2002-9, both as modified by Rev. Proc. 2002-19.

Line 9. For further details, see section 9.03(6)(a) of Rev. Proc. 2006-1 and either section 8.05 of Rev. Proc. 97-27 or section 4.02(6) of Rev. Proc. 2002-9, as applicable.

Line 10. For further details, see section 9.03(6)(b) of Rev. Proc. 2006-1.

Line 13. Each applicant, including each member of a consolidated group and each eligible CFC filing a single Form 3115 requesting the identical accounting method change, must attach a schedule describing its trade(s) or business(es) for each separate and distinct trade or business of the applicant, including any QSUB or single-member LLC. For guidance regarding the phrase “separate and distinct trade or business,” see Regulations section 1.446-1(d). Entering the PBA code in the box at the top of page 1 satisfies the requirement to submit the PBA code for each trade or business.

Line 14. Insurance companies must also state whether the proposed method of accounting will be used for annual statement accounting purposes.

Line 16. For details on requesting and scheduling a conference of right, see sections 9.04(4) and 10 of Rev. Proc. 2006-1.

Line 17. For an applicant changing to or from the cash method or changing its method of accounting under sections 263A, 448, 460, or 471, enter the gross receipts, as determined under the

applicable Code section, of the applicant and other taxpayers, as applicable.

Part III—Information For Advance Consent Request

Advance Consent Request Scope Limitations

An applicant may not use the advance consent request procedures if any of the following four scope limitations apply at the time the Form 3115 would be filed with the IRS National Office. See Rev. Proc. 97-27 as modified by Rev. Proc. 2002-19.

1. The change in accounting method is required to be made pursuant to a published automatic change procedure. For more information, see section 4.02(1) of Rev. Proc. 97-27.

2. The applicant is under examination, except as provided in section 4.02(2) of Rev. Proc. 97-27, as modified by Rev. Proc. 2002-19.

3. The applicant is (or was formerly) a member of a consolidated group that is under examination, or before an Appeals office, or before a Federal court for the tax year(s) the applicant was a member of the group. For more information, see section 4.02(5) of Rev. Proc. 97-27.

4. In the case of a partnership or S corporation, the accounting method the applicant is requesting to change is an issue under consideration in an examination, or by an Appeals office, or before a Federal court with respect to a partner, member, or shareholder of the applicant. For more information, see section 4.02(6) of Rev. Proc. 97-27.

Line 18. If the requested change is covered by an automatic change request procedure, and the procedure applies to the applicant for the requested year of change, the applicant is not eligible to file an advance consent request. If the requested change is covered by an automatic change request procedure, explain why the applicant is requesting to make the change under advance consent request procedures.

Line 19. For further details on what is to be included in the attachment, see sections 9.03(1) (facts and other information), 9.03(4) (analysis of material facts), 7.01(8) and 9.03(1) (statement of supporting authorities), 9.03(2) (statement of contrary authorities), and 9.03(7) (statement identifying pending legislation) of Rev. Proc. 2006-1.

Line 20. True copies of all contracts, agreements, and other documents directly related to the proposed accounting method change must be submitted with the request. See section 9.03(3) of Rev. Proc. 2006-1.

Line 21. For further details on what is to be included in the attachment, see section 7.01(1)(d) and 9.03(1) of Rev. Proc. 2006-1.

Line 23. Taxpayers filing under the advance consent request procedures must pay a user fee for each Form 3115. See Appendix A of Rev. Proc. 2006-1. (Taxpayers filing under an automatic change request procedure do not pay a user fee.)

A separate user fee must be paid for each member of an affiliated group and for each separate and distinct trade or business of a taxpayer (including a QSUB or a single-member LLC) to which the requested advance consent accounting method change applies. If the filer is not requesting an advance consent accounting method change for itself, a user fee for the filer is not required.

However, the reduced user fee in section (A)(5)(b) of Appendix A of Rev. Proc. 2006-1 applies in the following situations.

1. A taxpayer requesting an **identical** accounting method change on a single Form 3115 for two or more separate and

distinct trades or businesses (for purposes of Regulations section 1.446-1(d)), including QSUBs or single-member LLCs;

2. A common parent corporation requesting the **identical** accounting method change on a single Form 3115 on behalf of two or more members of the consolidated group;

3. A common parent requesting the **identical** accounting method change on a single Form 3115 on behalf of two or more CFCs that do not engage in a trade or business within the United States where all controlling U.S. shareholders of the CFCs are members of the consolidated group; or

4. A taxpayer requesting an **identical** accounting method change on a single Form 3115 on behalf of two or more CFCs that do not engage in a trade or business within the United States for which the taxpayer is the sole controlling U.S. shareholder of the CFCs.

If any of the situations listed above apply, the user fee in section (A)(3)(b)(i) or section (A)(4) of Appendix A of Rev. Proc. 2006-1, as applicable, must be paid for the first member of the consolidated group, CFC, or separate and distinct trade or business, and the reduced user fee in section (A)(5)(b) of Appendix A must be paid for each additional member of the group, CFC, or separate and distinct trade or business. If a filer qualifies for a reduced user fee under section (A)(5)(b) of Appendix A, the filer must submit the additional information required by section 15.07 of Rev. Proc. 2006-1. A user fee is only required for members of the group, CFCs, or separate and distinct trades or businesses requesting the accounting method change. See section 15.07(4) of Rev. Proc. 2006-1 for what qualifies as an identical accounting method change.

Filers whose gross income is less than the amounts specified in (A)(4) in Appendix A of Rev. Proc. 2006-1 qualify for a reduced user fee. For the definition of gross income, see (B)(2), (3), and (4) in Appendix A of Rev. Proc. 2006-1. If the filer qualifies for the reduced user fee under this provision, the filer must attach to the Form 3115 the representation required by (B)(1) in Appendix A of Rev. Proc. 2006-1.

For information on user fees for tax-exempt organizations, see Rev. Proc. 2006-8, 2006-1 I.R.B. 245 (or its successor).

The user fee (check or money order payable to the Internal Revenue Service) must be attached to the Form 3115 that is filed with the IRS National Office.

Part IV—Section 481(a) Adjustment

Line 24. Ordinarily, an adjustment under section 481(a) is required for accounting method changes. However, for certain accounting method changes, the taxpayer must use the cut-off method. In those cases there is no section 481(a) adjustment.

Line 25. Attach a schedule showing the section 481(a) adjustment for each applicant included in the Form 3115. This schedule may be combined with the information requested on the fourth line on page 1 (list of applicants and their identification numbers) and on line 23 (user fee). Include a summary of the computation of the section 481(a) adjustment and an explanation of the methodology used to determine it. If the section 481(a) adjustment is based on more than one component of the accounting method being changed, include a summary of the computation for each component. The summary of the computation and explanation of the section 481(a) adjustment need not be extensive but should be sufficient to demonstrate that the section 481(a) adjustment is being computed correctly.

Entering the PBA code in the box at the top of page 1 satisfies the requirement to submit the PBA code for each applicant.

Example. Under its present method, XYZ Corporation is deducting certain costs that are required to be capitalized into inventory under section 263A. XYZ Corporation is proposing to

change its method of accounting to properly capitalize such costs. The computation of the section 481(a) adjustment with respect to the change in method of accounting may be demonstrated as follows:

Beginning inventory for year of change under proposed method	\$120,000
Beginning inventory for year of change under present method	100,000
Difference (positive section 481(a) adjustment)	+\$ 20,000

Schedule A—Change in Overall Method of Accounting

Part I—Change in Overall Method

All applicants filing to change their overall method of accounting must complete Part I, including applicants filing under designated automatic accounting method change numbers 30, 32, 33, and 34 in the **List of Automatic Accounting Method Changes**.

Lines 1a through 1g. Enter the amounts requested on lines 1a through 1g, even though the calculation of some amounts may not have been required in determining taxable income due to the applicant's present method of accounting.

Note: Do not include amounts that are not attributable to the change in method of accounting, such as amounts that correct a math or posting error or errors in calculating tax liability.

Line 1b. Enter amounts received or reported as income in a prior year that were not earned as of the beginning of the year of change. Examples include:

1. An advance payment received in a prior year for goods that were not delivered by the beginning of the year of change may be reported upon delivery if the taxpayer qualifies under Regulations section 1.451-5. If any amounts entered on line 1b are for advance payments, complete Schedule B. See the instructions for Schedule B before completing Schedule B.

2. A discount on installment loans is reported as income in the year the loans were made instead of in the year(s) the income was received or earned.

Line 1h. Enter the net amount, which is the net section 481(a) adjustment, on line 1h. Also, enter the net section 481(a) adjustment on line 25 in Part IV on page 3.

The following example illustrates how an applicant calculates the section 481(a) adjustment when changing to an accrual method, a nonaccrual-experience method, and the recurring item exception.

Example. ABC Corporation, a calendar year taxpayer using the cash method of accounting, has the following items of unreported income and expense on December 31, 2005:

Accrued income	\$250,000
Uncollectible amounts based on the nonaccrual-experience method	50,000
Accrued amounts properly deductible (economic performance has occurred)	75,000
Expenses eligible for recurring item exception	5,000

ABC Corporation changes to an overall accrual method, a nonaccrual-experience method, and the recurring item exception for calendar year 2006. The section 481(a) adjustment is calculated as follows:

Accrued income	\$250,000
Less:	
Uncollectible amount	50,000
Net income accrued but not received	\$200,000
Less:	
Accrued expenses	75,000
Expenses deducted as recurring item	5,000
Total expenses accrued but not paid	80,000
Section 481(a) adjustment	\$120,000

Line 2. If an applicant is requesting to use the recurring item exception (section 461(h)(3)), the section 481(a) adjustment must include the amount of the additional deduction that results from using the recurring item exception.

Part II—Change to the Cash Method For Advance Consent Request

Limits on cash method use. Except as provided below, C corporations and partnerships with a C corporation as a partner may not use the cash method of accounting. Tax shelters, also, are precluded from using the cash method. For this purpose, a trust subject to tax on unrelated business income under section 511(b) is treated as a C corporation with respect to its unrelated trade or business activities.

The limit on the use of the cash method under section 448 does not apply to:

1. Farming businesses as defined in section 448(d)(1).
2. Qualified personal service corporations as defined in section 448(d)(2).
3. C corporations and partnerships with a C corporation as a partner if the corporation or partnership has gross receipts of \$5 million or less. See section 448(b)(3) and (c) to determine if the applicant qualifies for this exception.

For farming corporations and partnerships with a C corporation as a partner, see section 447 for limits on the use of the cash method.

Use of the cash method is also limited under Regulations sections 1.471-1 and 1.446-1(c)(2)(i) if the applicant purchases, produces, or sells merchandise that is an income-producing factor in its business. However, for exceptions to this limitation, see section 5.05 in the Appendix of Rev. Proc. 2002-9 and Rev. Proc. 2002-28.

Schedule B—Change in Reporting Advance Payments

Line 1. In general, advance payments must be included in gross income in the tax year of receipt. However, for federal income tax purposes, Rev. Proc. 2004-34, 2004-22 I.R.B. 991, allows applicants on the accrual method, in certain circumstances, to defer to the next tax year amounts received (or amounts due and payable) that are attributable to a subsequent tax year. Applicants requesting the deferral method under Rev. Proc. 2004-34 must provide the information and documentation in section 8.03(2) of Rev. Proc. 2004-34 in lieu of the information and documentation required by Line 1 of Schedule B.

Line 2. Advance payments received under a contract for the sale of goods generally may be deferred for federal income tax purposes until the second year following the receipt of substantial advance payments on the contract. See Regulations section 1.451-5 for requirements that must be met and for the definition of "substantial advance payments."

Schedule C—Changes Within the LIFO Inventory Method

Use this schedule to request a change from one LIFO inventory method or submethod to another LIFO inventory method or submethod. All applicants changing within the LIFO inventory method or submethods must complete Part I. Complete Part II only if applicable.

Part I—General LIFO Information

Line 6. Applicants changing to the IPIC method must use this method for all LIFO inventories. This includes applicants requesting designated automatic accounting method change numbers **61** or **62** in the **List of Automatic Accounting Method Changes**.

Schedule D—Change in the Treatment of Long-Term Contracts Under Section 460, Inventories, or Other Section 263A Assets

Part I—Change in Reporting Income From Long-Term Contracts

Line 2a. Under section 460(f), the term “long-term contract” means any contract for the manufacture, building, installation, or construction of property that is not completed in the tax year in which it is entered into. However, a manufacturing contract will not qualify as long-term unless the contract involves the manufacture of **(a)** a unique item not normally included in finished goods inventory or **(b)** any item that normally requires more than 12 calendar months to complete.

Generally, all long-term contracts entered into after July 10, 1989, that do not meet the exceptions under section 460(e) must be accounted for using the percentage of completion method. See section 460 and the related regulations.

Line 2b. To qualify for the contract exceptions under section 460(e), the contract must be:

1. A home construction contract entered into after June 20, 1988, involving dwelling units in buildings containing four or fewer units, or
2. Any other construction contract entered into by the applicant if, at the time the contract is entered into, it is expected to be completed within 2 years and the applicant's average annual gross receipts determined under section 460(e)(2) for the 3-year period preceding the tax year the contract was entered into did not exceed \$10 million.

Line 4b. Under the simplified cost-to-cost method, only certain costs are used in determining both **(a)** costs allocated to the contract and incurred before the close of the tax year and **(b)** estimated contract costs. These costs are: **(1)** direct material costs; **(2)** direct labor costs; and **(3)** allowable deductions for depreciation, amortization, and cost recovery allowances on equipment and facilities directly used to construct or produce the subject matter of the long-term contract. See Regulations section 1.460-5(c).

Part II—Change in Valuing Inventories Including Cost Allocation Changes

If the applicant is currently using a LIFO inventory method or submethod and is changing to another LIFO inventory method or submethod, Part II is not applicable. Use Schedule C, Changes Within the LIFO Inventory Method.

Line 3. If an applicant is subject to, but not in compliance with, section 263A, generally on the same Form 3115 the applicant must first comply with section 263A before changing an

inventory valuation method. The applicant must complete Schedule D, Part III, Method of Cost Allocation. For exceptions, see Regulations section 1.263A-7(b)(2).

Line 5a. If the applicant properly elected the LIFO inventory method but is unable to furnish a copy of Form(s) 970, attach the following statement to Form 3115:

“I certify that to the best of my knowledge and belief **(name of applicant)** properly elected the LIFO inventory method by filing Form 970 with its return for the tax year(s) ended **(insert date(s))** and otherwise complied with the provisions of section 472(d) and Regulations section 1.472-3.”

Line 5c. Attach the three statements required by section 10.01(4) in the Appendix of Rev. Proc. 2002-9.

Part III—Method of Cost Allocation

Applicants requesting to change their method of accounting for any property (produced or acquired for resale) subject to section 263A or any long-term contracts as described in section 460 must complete this schedule.

If the change is for noninventory property that is subject to section 263A, attach a detailed description of the types of property involved and an explanation detailing how that property was accounted for prior to January 1, 1987.

There are several methods available for allocating and capitalizing costs under section 263A, and for allocating and, where appropriate, capitalizing costs properly allocable to long-term contracts. A change to or from any of these methods is a change in accounting method that requires IRS consent. Using the applicable regulations and notice listed below, the applicant should verify which methods are presently being used and the proposed methods that will be used before completing Schedule D, Part III. These methods are as follows:

1. Allocating Direct and Indirect Costs

- Specific identification method—Regulations sections 1.263A-1(f)(2) and 1.460-5.
- Burden rate method—Regulations sections 1.263A-1(f)(3)(i) and 1.460-5.
- Standard cost method—Regulations sections 1.263A-1(f)(3)(ii) and 1.460-5.
- Any other reasonable allocation method—Regulations sections 1.263A-1(f)(4) and 1.460-5.

2. Allocating Mixed Service Costs

- Direct reallocation method—Regulations section 1.263A-1(g)(4)(iii)(A).
- Step-allocation method—Regulations section 1.263A-1(g)(4)(iii)(B).
- Simplified service cost method:
 - Using the labor-based allocation ratio—Regulations section 1.263A-1(h)(4).
 - Using the production cost allocation ratio—Regulations section 1.263A-1(h)(5).
- Any other reasonable allocation method—Regulations section 1.263A-1(f)(4).

3. Capitalizing Additional Section 263A Costs

- Simplified production method:
 - Without historic absorption ratio election—Regulations section 1.263A-2(b)(3).
 - With historic absorption ratio election—Regulations section 1.263A-2(b)(4).
- Simplified resale method:
 - Without historic absorption ratio election—Regulations section 1.263A-3(d)(3).
 - With historic absorption ratio election—Regulations section 1.263A-3(d)(4).
- U.S. ratio method—Notice 88-104, 1988-2 C.B. 443.

- Any other reasonable allocation method—Regulations section 1.263A-1(f)(4) (including the methods listed on page 8 under **Allocating Direct and Indirect Costs**).

Schedule E—Change in Depreciation or Amortization

All applicants requesting to change their method of depreciation or amortization must complete Schedule E of Form 3115.

Applicants changing their method of accounting for depreciation or amortization under the automatic change request procedures should see the depreciation changes in the **List of Automatic Accounting Method Changes**.

Do not file Form 3115:

1. To make an election under sections 167, 168, 179, 1400I, 1400L(b), 1400L(c), or 1400N(d), or former section 168,
2. To revoke an election made under one of those sections,
3. To make or revoke an election under section 13261(g)(2) or (3) of the Revenue Reconciliation Act of 1993 (relating to section 197 intangibles),
4. To change the placed-in-service date,
5. To change the salvage value (except for a change in salvage value to zero when the salvage value is expressly treated as zero by the Code, the regulations, or other published guidance), or
6. To change a useful life under section 167 (except for a change to or from a useful life, recovery period, or amortization period that is specifically assigned by the Code, the regulations, or other published guidance).

List of Automatic Accounting Method Changes

Listed below are automatic accounting method changes providing for the filing of Form 3115. The **List of Automatic Accounting Method Changes** includes regulatory automatic changes, changes provided for in the Appendix of Rev. Proc. 2002-9, and automatic changes provided for in other guidance. These automatic changes may be modified or supplemented with additional automatic changes by subsequently published guidance.

Note: The list provides a brief description of each automatic accounting method change that is included in the list. A filer/applicant may not rely on the list or the descriptions of accounting method changes in the list as authority for making an accounting method change. A filer/applicant that is within the scope of, and complies with, all the applicable provisions of the published guidance that authorizes each listed change may rely on the applicable published guidance as authority for its automatic accounting method change. If any information in the **List of Automatic Accounting Method Changes** conflicts with published guidance, the published guidance applies.

Each item in the list below:

- Designates an automatic accounting method change number for each change for entry on line 1a of Form 3115.
- Briefly describes the accounting method change.
- Indicates if scope limitation rules may not apply.
- Indicates if audit protection may not apply.
- Indicates in some cases which schedules of Form 3115 to complete.
- Indicates in some cases any additional reporting requirements.
- Indicates in some cases if the change is made on a cut-off basis.
- Provides a reference to the basic published guidance (for example, revenue procedure) that provides for the automatic change, which filers should review prior to completing Part I,

Information For Automatic Change Request, on page 1 of Form 3115.

1. **Commodity Credit Corporation loans (section 77)**—for loans received from the Commodity Credit Corporation, **from** including the loan amount in gross income for the tax year in which the loan is received **to** treating the loan amount as a loan. Scope limitations do not apply to this change. This change is made on a cut-off basis. See *section 1.01 in the Appendix of Rev. Proc. 2002-9*.

2. **Lawyers handling cases on a contingent fee basis (section 162)**—**from** treating advances of money to their clients for litigation costs as deductible business expenses **to** treating those advances as loans. See *section 1A.01 in the Appendix of Rev. Proc. 2002-9*.

3. **ISO 9000 costs (section 162)**—**to** treating the costs as deductible, except to the extent they result in the creation or acquisition of an asset having a useful life substantially beyond the tax year. Scope limitations do not apply to this change. See *section 1A.04 in the Appendix of Rev. Proc. 2002-9*.

4. **Restaurant smallwares costs (section 162)**—**to** the smallwares method described in Rev. Proc. 2002-12, 2002-3 I.R.B. 374 (that is, as materials and supplies that are not incidental under Regulations section 1.162-3). Scope limitations do not apply to this change. The entire section 481(a) adjustment must be taken into account in the year of change. See *section 1A.06 in the Appendix of Rev. Proc. 2002-9*.

5. **Bad debts (section 166)**—for an applicant other than a bank, **from** accounting for bad debts using a reserve or other improper method **to** a specific charge-off method that complies with section 166. See *section 1B.01 in the Appendix of Rev. Proc. 2002-9*.

6. **Bad debt conformity for banks (section 166)**—for banks other than new banks, **to** the method that conforms to Regulations section 1.166-2(d)(3) for the first time the bank makes this change, or **to** involuntarily revoke this method. This change does not fall under the procedures of Rev. Proc. 2002-9. Instead, see *Regulations section 1.166-2(d)(3)*.

7. **Depreciation or amortization (impermissible) (sections 56, 167, 168, 197, 1400I, 1400L, and former section 168)**—**from** an impermissible method **to** a permissible method for changes allowed under Temporary Regulations section 1.446-1T(e)(2)(ii)(d), and for depreciable property owned at the beginning of the year of change. Complete Schedule E of Form 3115. Attach the statements required by section 2.01(2)(b) in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2004-11, 2004-3 I.R.B. 311 (or successor), and Rev. Proc. 2005-43, 2005-29 I.R.B. 107. Certain scope limitations do not apply. An applicant changing its method of accounting for depreciation because of a change described in designated automatic accounting method change number **10** (sale or lease transactions) must file the Form 3115 in accordance with designated automatic accounting method change number **10**. See *section 2.01 in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2003-50, 2003-29 I.R.B. 119, and Rev. Proc. 2004-11 (or successor), as modified by Rev. Proc. 2005-43*.

8. **Depreciation (permissible) (sections 56 and 167)**—**from** a permissible method **to** another permissible method listed in section 2.02 in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2004-11, 2004-3 I.R.B. 311 (or successor). Complete Schedule E of Form 3115. For public utility property, attach the statement required by section 2.02(4)(d) in the Appendix of Rev. Proc. 2002-9. Certain scope limitations do not apply. The section 481(a) adjustment is zero. See *section 2.02 in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2004-11 (or successor)*.

9. **Post-disposition depreciation or amortization (sections 56, 167, 168, 197, 1400I, and 1400L, and former section 168)**—for an item of depreciable or amortizable

property disposed of by the taxpayer during the year of change for which the taxpayer deducted less than the depreciation allowable, **from** an impermissible method of accounting for depreciation or amortization **to** a permissible method of accounting for depreciation or amortization. Complete Schedule E of Form 3115. Scope limitations do not apply. Attach the original Form 3115 to the filer's timely filed amended income tax return for the year of change and file the IRS National Office copy no later than when the original Form 3115 is filed with that amended return. The amended income tax return must include the adjustments to taxable income and any collateral adjustments to taxable income or tax liability (for example, adjustments to the amount or character of the gain or loss) resulting from this change in method of accounting. See *Rev. Proc. 2004-11, 2004-3 I.R.B. 311*.

10. Sale or lease transactions (sections 61, 162, 167, 168, and 1012)—**from** treating property as sold **to** treating property as leased, and vice versa, and **from** treating property as purchased **to** treating property as leased, and vice versa. Audit protection does not apply to this change. This change is made on a cut-off basis. See *section 2.03 in the Appendix of Rev. Proc. 2002-9*.

11. Modern golf course greens (sections 167, 168, and former section 168)—either **to** capitalization of land preparation costs undertaken in the construction of modern greens that are closely associated with depreciable assets or **to** the addition to basis of land for earthmoving costs inextricably associated with the land. Complete Schedule E of Form 3115. See *section 2.04 in the Appendix of Rev. Proc. 2002-9*.

12. Original and replacement tire costs (section 168)—for qualifying vehicles, **to** the original tire capitalization method. Complete Schedule E of Form 3115. See *Rev. Proc. 2002-27, 2002-17 I.R.B. 802*.

13. Depreciation of gas pump canopies (sections 167, 168, and former section 168)—for depreciation of certain stand-alone gasoline pump canopies and their supporting concrete footings, **to** classifying the gasoline pump canopies in asset class 57.0 of Rev. Proc. 87-56, 1987-2 C.B. 674, and **to** classifying the supporting concrete footings in asset class 00.3 of Rev. Proc. 87-56. Complete Schedule E of Form 3115. See *Rev. Rul. 2003-54, 2003-23 I.R.B. 982*.

14. Depreciation of utility assets (sections 167, 168, and former section 168)—for depreciation of assets owned by a utility used in general business operations, **to** classifying assets under Rev. Proc. 87-56, 1987-2 C.B. 674, to conform with Rev. Rul. 2003-81, 2003-30 I.R.B. 126. Complete Schedule E of Form 3115. See *Rev. Rul. 2003-81*.

15. Depreciation of cable TV fiber optics (sections 167 and 168)— for depreciation of fiber optic node and trunk line of a cable television distribution system, **to** a safe harbor method for classifying the unit of property either as providing one-way communication services or two-way communication services. See *Rev. Proc. 2003-63, 2003-32 I.R.B. 304*.

16. Amortizable bond premium (section 171)—**from** amortizing bond premium **to** not amortizing the premium (revoking the section 171(c) election). Attach the statement required by section 1C.01(4) in the Appendix of Rev. Proc. 2002-9. This change is made on a cut-off basis. See *section 1C.01 in the Appendix of Rev. Proc. 2002-9*.

17. Research and experimental expenditures (section 174)—**from** the capitalization method **to** another permissible method, **from** the expense method **to** another permissible method, **from** the deferred expense method **to** another permissible method, or **from** the current period of amortization **to** a different period of amortization under the deferred expense method. Attach the statement required by section 2A.01(4) in the Appendix of Rev. Proc. 2002-9. Audit protection does not apply to this change. This change is made on a cut-off basis. See *section 2A in the Appendix of Rev. Proc. 2002-9*.

18. Computer software expenditures (sections 162 and 167)—for costs of developed, acquired, or leased or licensed computer software, **to** deductible expenses or capital expenditures and amortization (for developed software), **to** capital expenditures and depreciation or amortization (for acquired computer software), or **to** deductible expenses under Regulations section 1.162-11 (for leased or licensed computer software). Complete Schedule E of Form 3115 for changes relating to acquired computer software or developed computer software if the change is to capital expenditures and amortization. If applicable, attach the statement required by section 2B.04 in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2004-11, 2004-3 I.R.B. 311. See *section 2B in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2004-11*.

19. Package design costs (section 263)—**to** the capitalization method, **to** the design-by-design capitalization and 60-month amortization method, or **to** the pool-of-cost capitalization and 48-month amortization method. For changes to the capitalization method or to the design-by-design capitalization and 60-month amortization method, attach the statement required by section 3.01(2) in the Appendix of Rev. Proc. 2002-9. See *section 3.01 in the Appendix of Rev. Proc. 2002-9*.

20. Line pack gas or cushion gas costs (section 263)—**to** treating the costs as capital expenditures, the costs of recoverable amounts as not depreciable, and the costs of unrecoverable amounts as depreciable. A taxpayer that changes its method for the costs of unrecoverable amounts also must change to a permissible method of depreciation for those costs. See *section 3.02 in the Appendix of Rev. Proc. 2002-9*.

21. Removal costs (section 263)—for certain costs incurred in the retirement and removal of depreciable assets, **to** a method that conforms with Rev. Rul. 2000-7, 2000-9 I.R.B. 712. For public utility property, attach the statement required by section 3.03(2)(b) in the Appendix of Rev. Proc. 2002-9. Scope limitations do not apply to this change. See *section 3.03 in the Appendix of Rev. Proc. 2002-9*.

22. Certain uniform capitalization methods used by small resellers, formerly small resellers, and reseller-producers (section 263A)—for qualifying applicants, **to** a qualifying method or methods. Complete Schedule D, Parts II and III, of Form 3115. Scope limitations do not apply in certain cases. See *sections 6.01 and 6.02 of Rev. Proc. 2002-54, and section 4.01(5) in the Appendix of Rev. Proc. 2002-9*.

23. Certain uniform capitalization methods used by producers and reseller-producers (section 263A)—for qualifying applicants, **to** a qualifying method or methods. Complete Schedule D, Parts II and III, of Form 3115. The applicant may request this change and designated automatic accounting method change numbers **77** (environmental remediation costs) and **92** (allocation of environmental remediation costs to production) on a single Form 3115, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See *section 6.03 of Rev. Proc. 2002-54*.

24. Research and experimental expenditures under uniform capitalization methods (section 263A)—**from** capitalizing research and experimental expenditures to inventory **to** no longer capitalizing these costs to inventory. Complete Schedule D, Part II, of Form 3115, as applicable. Attach the statement required by section 4.04(2) in the Appendix of Rev. Proc. 2002-9. Audit protection does not apply to this change. The applicant may request this change and designated automatic accounting method change numbers **77** (environmental remediation costs) and **92** (allocation of environmental remediation costs to production) on a single Form 3115, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See *section 4.04 in the Appendix of Rev. Proc. 2002-9*.

25. **Impact fees (section 263A)**—for impact fees incurred in connection with the new construction or expansion of a residential building, **to** treating the costs as capital expenditures allocable to the building. Complete Schedule E of Form 3115 if the building is depreciable. The applicant may request this change and designated automatic accounting method change numbers **77** (environmental remediation costs) and **92** (allocation of environmental remediation costs to production) on a single Form 3115, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See *Rev. Rul. 2002-9, 2002-10 I.R.B. 614*.

26. **Related party transactions (section 267)**—for losses, expenses, and qualified stated interest incurred in transactions between related parties, **to** disallowing or deferring certain deductions attributable to such transactions in accordance with section 267. See *section 4A.01 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

27. **Deferred compensation determination (section 404)**—for determining whether an item of compensation is deferred compensation or when the item is paid, **from** making the determination by reference to when the item is secured **to** making the determination by reference to when the item is actually received. Audit protection and scope limitations do not apply to this change. The section 481(a) adjustment must be taken into account ratably over three tax years. See *section 4B.01 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

28. **Bonus or vacation pay deferred compensation (section 404)**—for bonuses that are deferred compensation, **from** treating as deductible or capitalizable when accrued, **to** treating as deductible or capitalizable in the year in which includible in the employee's income, and for vacation pay that is deferred compensation, **from** treating as deductible or capitalizable when accrued **to** treating as deductible or capitalizable in the year in which paid to the employee. See *section 4B.02 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

29. **Grace period contributions (section 404)**—for contributions made to a section 401(k) qualified cash or deferred arrangement or matching contributions under section 401(m), **from** treating contributions made after the end of the tax year but before the due date of the tax return as being "on account of" the tax year without regard to when the underlying compensation is earned **to** treating such contributions as not being "on account of" the tax year if they are attributable to compensation earned after the end of that tax year. See *Rev. Rul. 2002-46, 2002-29 I.R.B. 117, as modified by Rev. Rul. 2002-73, 2002-45 I.R.B. 805*.

30. **Overall accrual method (section 446)**—for a qualifying applicant, **from** a cash receipts and disbursements or a hybrid method **to** an overall accrual method, or **to** an overall accrual method in conjunction with the recurring item exception under section 461(h)(3), or **to** an overall accrual method for an applicant required to change to an overall accrual method under Regulations section 1.448-1(h)(2) (relating to the "first section 448 year"). Complete Schedule A, Part I, of Form 3115. Also complete Schedule D, Parts II and III, of Form 3115, as applicable. An applicant requesting this change and designated automatic accounting method change number **84** (deferral method for certain advance payments) must file a single Form 3115 for both changes. See *section 5.01 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

31. **Multi-year insurance policies for multi-year service warranty contracts (section 446)**—for a manufacturer, wholesaler, or retailer of motor vehicles or other durable consumer goods accounting for multi-year insurance policies for multi-year service warranty contracts, **to** capitalizing and amortizing the costs. See *section 5.03 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

32. **Overall cash method (\$1 million) (section 446)**—for qualifying applicants changing **to** the overall cash method.

Complete Schedule A, Part I, of Form 3115. Also, complete Schedule D, Parts II and III, of Form 3115, as applicable. Scope limitations do not apply to this change. The applicant may request this change and designated automatic accounting method change number **50** (small taxpayer (\$1 million) inventory exception) on a single Form 3115. See *section 5.05 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

33. **Overall cash method (\$10 million) (section 446)**—for qualifying applicants changing **to** the overall cash method. Complete Schedule A, Part I, of Form 3115. Also, complete Schedule D, Parts II and III, of Form 3115, as applicable. Scope limitations do not apply to this change. The applicant may request this change and designated automatic accounting method change number **51** (small taxpayer (\$10 million) inventory exception) on a single Form 3115. See *Rev. Proc. 2002-28, 2002-18 I.R.B. 815*.

34. **Overall accrual method (section 448)**—to an overall accrual method for the applicant's first tax year it is required to change from the cash method by section 448. Complete Schedule A, Part I, of Form 3115. Also, complete Schedule D, Parts II and III, of Form 3115, as applicable. An applicant requesting this change, designated automatic accounting method change number **35** (nonaccrual-experience method), and/or designated automatic accounting method change number **84** (deferral method for certain advance payments) must file a single Form 3115 for all such changes. This change does not fall under the procedures of Rev. Proc. 2002-9. Instead, see *Regulations section 1.448-1, 2002-9*.

35. **Nonaccrual-experience method (section 448)**—for an applicant changing its method of accounting for amounts received for the performance of services in fields described in section 448(d)(2)(A) (that is, health, law, engineering, architecture, accounting, actuarial science, performing arts, or consulting), **from** an overall accrual method **to** a nonaccrual-experience method, **from** one nonaccrual-experience method **to** another nonaccrual-experience method, and/or **from** the present method **to** a periodic system under Notice 88-51, 1988-1 C.B. 535. An applicant requesting this change, designated automatic accounting method change number **34** (overall accrual method under section 448), and/or designated automatic accounting method change number **84** (deferral method for certain advance payments) must file a single Form 3115 for all such changes. See *Temporary Regulations section 1.448-2T(g) and (h) and Notice 88-51, 2002-9*.

36. **Interest accrual on non-performing loans (section 451)**—for an accrual method bank accounting for qualified stated interest on non-performing loans, **to** the method whereby interest is accrued until either the loan is worthless under section 166 and is charged off as a bad debt or the interest is determined to be uncollectible. See *section 5A.01 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

37. **Advance rentals (section 451)**—for advance rentals other than advance rentals subject to section 467, **to** inclusion in gross income in the tax year received. See *section 5A.03 in the Appendix of Rev. Proc. 2002-9, 2002-9*.

38. **State tax refunds (section 451)**—for an accrual method applicant with state or local income or franchise tax refunds, **to** accrue these items in the tax year the applicant receives payments or notice of approval of its refund claim (whichever is earlier), in accordance with Rev. Rul. 2003-3, 2003-2 I.R.B. 252. See *Rev. Rul. 2003-3, 2003-3*.

39. **Capital cost reduction (CCR) payments (section 451)**—for CCR payments (as defined in Rev. Proc. 2002-36, 2002-21 I.R.B. 993) made by vehicle lessees, **to** the method that excludes these payments from the applicant's gross income and from the applicant's bases in the purchased vehicles. See *Rev. Proc. 2002-36, 2002-36*.

40. **Exclusion for certain returned magazines, paperbacks, or records (section 458)**—for an accrual

method applicant electing to exclude from gross income some or all of the income attributable to qualified sales during the tax year of magazines, paperbacks, or records that are returned before the close of the applicable merchandise return period for that tax year. The applicant's Form 3115 need contain only the information listed in Regulations section 1.458-2(d). This election does not fall under the procedures of Rev. Proc. 2002-9. Instead, see *Regulations section 1.458-2*.

41. **Percentage-of-completion (section 460)**—for an applicant not required by section 460 to use the percentage-of-completion method to account for its long-term contracts, **from** an exempt-contract method **to** the percentage-of-completion method. Complete Schedule D, Parts I and III, of Form 3115. Audit protection does not apply to this change. This change is made on a cut-off basis. See *section 7A.02 in the Appendix of Rev. Proc. 2002-9*.

42. **Timing of incurring employee medical benefits liabilities (section 461)**—for an applicant with an obligation to pay an employee's medical expenses that is neither insured nor paid from a welfare benefit fund, **to** treatment as a liability incurred in the tax year in which the applicant's employee files the claim with the applicant. See *section 8.01 in the Appendix of Rev. Proc. 2002-9*.

43. **Timing of incurring real property, personal property, and state income tax liabilities (section 461)**—for a qualifying applicant, **to** treating these taxes as incurred in the tax year in which the taxes are paid, or **to** account for these taxes under the recurring item exception to the economic performance rules, or **to** revoke the ratable accrual election under section 461(c). See *section 8.02 in the Appendix of Rev. Proc. 2002-9*.

44. **Timing of incurring workers' compensation act, tort, breach of contract, or violation of law liabilities (section 461)**—for a qualifying applicant accounting for self-insured liabilities arising under any workers' compensation act or out of any tort, breach of contract, or violation of law, **to** treating the liability as incurred in the tax year in which (a) all the events have occurred establishing the fact of the liability, (b) the amount of the liability can be determined with reasonable accuracy, and (c) payment is made to the person to which the liability is owed. See *section 8.03 in the Appendix of Rev. Proc. 2002-9*.

45. **Timing of incurring payroll tax liabilities (section 461)**—for FICA and FUTA taxes, state unemployment taxes, and railroad retirement taxes, **to** the method under which the applicant may deduct in Year 1 its otherwise deductible FICA and FUTA taxes, state unemployment taxes, and railroad retirement taxes imposed with respect to year-end wages properly accrued in Year 1, but paid in Year 2, if the requirements of the recurring item exception are met, or, for state unemployment taxes and railroad retirement taxes, **to** the method stated above where the applicant already uses that method of accounting for FICA and FUTA taxes. See *section 8.04 in the Appendix of Rev. Proc. 2002-9*.

46. **Cooperative advertising (section 461)**—**to** incurring a liability in the tax year in which these services are performed, provided the manufacturer is able to reasonably estimate this liability even though the retailer does not submit the required claim form until the following year. See *section 8.05 in the Appendix of Rev. Proc. 2002-9*.

47. **Distributor commissions (section 461)**—**from** deducting distributor commissions **to** capitalizing and amortizing distributor commissions using the distribution fee period method, the 5-year method, or the useful life method. This change is made on a cut-off basis. See *section 8.06(2) in the Appendix of Rev. Proc. 2002-9*.

48. **Cash discounts (section 471)**—for cash discounts granted for timely payment, when such discounts approximate a fair interest rate, **from** a method of consistently including the price of the goods before discount in the cost of the goods and

including in gross income any discounts taken **to** a method of reducing the cost of the goods by the cash discounts and deducting as an expense any discounts not taken, or vice versa. Complete Schedule D, Parts II and III, of Form 3115, as applicable. See *section 9.01 in the Appendix of Rev. Proc. 2002-9*.

49. **Estimating inventory shrinkage (section 471)**—**from** the present method of estimating inventory shrinkage in computing ending inventory **to** the "retail safe harbor method" in section 4 of Rev. Proc. 98-29, 1998-15 I.R.B. 22, or **to** a method other than the retail safe harbor method, provided (a) the applicant's present method of accounting does not estimate inventory shrinkage and (b) the applicant's new method of accounting (that estimates inventory shrinkage) clearly reflects income under section 446(b). Complete Schedule D, Parts II and III, of Form 3115, as applicable. If changing to a method other than the "retail safe harbor method," attach the statement required by section 9.02(3) in the Appendix of Rev. Proc. 2002-9. Scope limitations do not apply to this change. Audit protection does not apply in certain cases. See *section 9.02 in the Appendix of Rev. Proc. 2002-9*.

50. **Small taxpayer (\$1 million) inventory exception (section 471)**—for a qualifying applicant, **from** the present method of accounting for inventoriable items (including, if applicable, the method of capitalizing costs under section 263A) **to** treating inventoriable items in the same manner as materials and supplies that are not incidental under Regulations section 1.162-3. Complete Schedule A, Part I, and Schedule D, Parts II and III, of Form 3115, as applicable. Scope limitations do not apply to this change. The applicant may request this change and designated automatic accounting method change number **32** (overall cash method (\$1 million)) on a single Form 3115. See *section 9.03 in the Appendix of Rev. Proc. 2002-9*.

51. **Small taxpayer (\$10 million) inventory exception (section 471)**—for a qualifying applicant, **from** the present method of accounting for inventoriable items (including, if applicable, the method of capitalizing costs under section 263A) **to** treating inventoriable items in the same manner as materials and supplies that are not incidental under Regulations section 1.162-3. Complete Schedule D, Parts II and III, of Form 3115, as applicable. Scope limitations do not apply to this change. The applicant may request this change and designated automatic accounting method change number **33** (overall cash method (\$10 million)) on a single Form 3115. See *Rev. Proc. 2002-28, 2002-18 I.R.B. 815*.

52. **"Floor stocks" (section 471)**—for payments made or received with respect to "floor stocks," **to** conform with the holding of Rev. Rul. 2001-8, 2001-9 I.R.B. 726, or **to** elect the simplifying assumption regarding goods on hand described in Rev. Rul. 2001-8. Complete Schedule D, Parts II and III, of Form 3115, as applicable. If electing the simplifying assumption, provide the statement described in section 9.04(4)(b) in the Appendix of Rev. Proc. 2002-9. Scope limitations do not apply to this change. This change is made on a cut-off basis. See *section 9.04 in the Appendix of Rev. Proc. 2002-9*.

53. **Qualifying volume-related trade discounts (section 471)**—**to** treating qualifying volume-related trade discounts as a reduction in the cost of merchandise purchased at the time the discount is recognized in accordance with Regulations section 1.471-3(b). Complete Schedule D, Parts II and III, of Form 3115, as applicable. See *section 9.05 in the Appendix of Rev. Proc. 2002-9*.

54. **Impermissible methods of inventory valuation (section 471)**—**to** restore an inventory writedown or **to** discontinue maintaining a reserve specifically described within Regulations section 1.471-2(f). Complete Schedule D, Parts II and III, of Form 3115, as applicable. See *section 9.06 in the Appendix of Rev. Proc. 2002-9*.

55. **Valuation of remanufactured cores (section 471)**—for remanufacturers and rebuilders of motor vehicle parts and resellers of remanufactured and rebuilt motor vehicle parts that use the lower of cost or market method to value their inventory of cores, **to** the safe harbor method of accounting (the “Core Alternative Valuation” method) to value inventories of cores as provided for in Rev. Proc. 2003-20, 2003-6 I.R.B. 445. Complete Schedule D, Parts II and III, of Form 3115, as applicable. See Rev. Proc. 2003-20.

56. **Change from LIFO inventory method (section 472)**—for an applicant changing **from** the LIFO inventory method for its entire LIFO inventory, or for a pool or pools within its LIFO inventory, **to** the permitted method as determined in section 10.01(1)(b) in the Appendix of Rev. Proc. 2002-9. Complete Schedule D, Parts II and III, of Form 3115, as applicable. Attach the statements required by section 10.01(4) in the Appendix of Rev. Proc. 2002-9. See section 10.01 in the Appendix of Rev. Proc. 2002-9.

57. **Determining current-year cost (section 472)**—to determine current-year cost: **(a)** by reference to the actual cost of the goods most recently purchased or produced; **(b)** by reference to the actual cost of the goods purchased or produced during the tax year in the order of acquisition; or **(c)** by application of an average unit cost equal to the aggregate actual cost of all the goods purchased or produced throughout the tax year divided by the total number of units so purchased or produced. Complete Schedule C, Part I, of Form 3115. This change is made on a cut-off basis. See section 10.02 in the Appendix of Rev. Proc. 2002-9.

58. **Alternative LIFO inventory method (section 472)**—for a qualifying applicant that sells new automobiles or new light-duty trucks, **to** the “Alternative LIFO Method” described in Rev. Proc. 97-36, 1997-33 I.R.B. 450. Complete Schedule C of Form 3115, as applicable. Attach the statement required by section 10.03(2)(c)(ii) in the Appendix of Rev. Proc. 2002-9 and the Form 970 required by reference in section 10.03(2)(c)(i) in the Appendix of Rev. Proc. 2002-9. This change is made on a cut-off basis. See section 10.03 in the Appendix of Rev. Proc. 2002-9.

59. **Used vehicle alternative LIFO method (section 472)**—for a qualifying applicant that sells used automobiles and used light-duty trucks, **to** the “Used Vehicle Alternative LIFO Method,” as described in Rev. Proc. 2001-23, 2001-10 I.R.B. 784. Complete Schedule C, Part I, of Form 3115. In general, this change is made on a cut-off basis. See section 10.04 in the Appendix of Rev. Proc. 2002-9.

60. **Determining the cost of used vehicles purchased or taken as a trade-in (section 472)**—for a qualifying applicant, **to** a method of **(a)** determining the cost of used vehicles acquired by trade-in using the average wholesale price listed by a consistently used official used car guide on the date of the trade-in; **(b)** determining the cost of used vehicles purchased for cash using the actual purchase price of the vehicle; or **(c)** reconstructing the beginning-of-the-year cost of used vehicles purchased for cash using values computed by national auto auction companies based on vehicles purchased for cash, where the national auto auction company selected is consistently used. Complete Schedule C, Part I, of Form 3115. This change is made on a cut-off basis. See section 10.05 in the Appendix of Rev. Proc. 2002-9.

61. **Change to IPIC inventory method (section 472)**—for a qualifying applicant, **from** a non-inventory price index computation (IPIC) LIFO inventory method **to** the IPIC method in accordance with all relevant provisions of Regulations section 1.472-8(e)(3). The applicant may request this change and designated automatic accounting method change number **57** (determining current-year cost), or this change and designated automatic accounting method change number **62** (changes within IPIC inventory method) on a single Form 3115. Complete Schedule C of Form 3115, as applicable. This change is made

on a cut-off basis. See section 10.06 in the Appendix of Rev. Proc. 2002-9.

62. **Changes within IPIC inventory method (section 472)**—for one or more of the following changes within IPIC: **(a)** **from** the double-extension IPIC method **to** the link-chain IPIC method, or vice versa; **(b)** **to** or **from** the 10 percent method; **(c)** **to** a pooling method described in Regulations section 1.472-8(b)(4) or Regulations section 1.472-8(c)(2), including a change to begin or discontinue applying one or both of the 5 percent pooling rules; **(d)** combine or separate pools as a result of the application of a 5 percent pooling rule described in Regulations section 1.472-8(b)(4) or Regulations section 1.472-8(c)(2); **(e)** change the selection of BLS tables **from** Table 3 (Consumer Price Index for All Urban Consumers (CPI-U): U.S. city average, detailed expenditure categories) of the monthly CPI Detailed Report **to** Table 6 (Producer price indexes and percent changes for commodity groupings and individual items, not seasonally adjusted) of the monthly PPI Detailed Report, or vice versa; or **(f)** change the representative month when necessitated because of a change in tax year or a change in method of determining current-year cost made pursuant to section 10.02 in the Appendix of Rev. Proc. 2002-9. A scope limitation does not apply in certain cases. The applicant may request the change described in **(f)** above and designated automatic accounting method change number **57** (determining current-year cost) on a single Form 3115. Complete Schedule C of Form 3115, as applicable. This change is made on a cut-off basis. See section 10.07 in the Appendix of Rev. Proc. 2002-9, as modified by Rev. Proc. 2003-45, 2003-27 I.R.B. 11.

63. **Replacement cost method for automobile dealers’ parts inventory (section 472)**—**to** the replacement cost method for automobile dealers’ parts inventory described in Rev. Proc. 2002-17, 2002-13 I.R.B. 676. Complete Schedule D, Parts II and III, of Form 3115, as applicable. This change is made on a cut-off basis. See Rev. Proc. 2002-17.

64. **Mark-to-market (section 475)**—for accounting for securities or commodities by commodities dealers, securities traders, and commodities traders, **to** the mark-to-market method. An election statement must be filed earlier than the due date of Form 3115. See Rev. Proc. 99-17, 1999-7 I.R.B. 52, for rules relating to this statement. Scope limitations do not apply to this change. See section 10A.02 in the Appendix of Rev. Proc. 2002-9.

65. **Dealer status changes (section 475)**—for an applicant electing out of certain exemptions from securities dealer status, **to** the mark-to-market method. Attach the statement(s) required by Rev. Proc. 97-43, 1997-39 I.R.B. 12. For a special cut-off rule, see section 5.02 of Rev. Proc. 97-43. This change does not fall under the procedures of Rev. Proc. 2002-9. Instead, see Rev. Proc. 97-43.

66. **Bank reserves for bad debts (section 585)**—**from** the section 585 reserve method **to** the section 166 specific charge-off method. Certain scope limitations do not apply. See section 11.01 in the Appendix of Rev. Proc. 2002-9.

67. **Insurance company premium acquisition expenses (section 832)**—for certain insurance companies, **to** a safe harbor method of accounting for premium acquisition expenses. Scope limitations do not apply to this change. See Rev. Proc. 2002-46, 2002-28 I.R.B. 105.

68. **Discounted unpaid losses (section 846)**—for insurance companies other than life insurance companies computing discounted unpaid losses, **to** the composite method or **to** alternative methods. See Rev. Proc. 2002-74, 2002-51 I.R.B. 980.

69. **Income from sources within the United States (section 861)**—for certain transactions involving computer programs, **to** a method that conforms with Regulations section 1.861-18. See section 11A.01 in the Appendix of Rev. Proc. 2002-9.

70. Functional currency (section 985)—to the use of another functional currency for the applicant or its qualified business unit. See section 11B.01 in the Appendix of Rev. Proc. 2002-9.

71. Rule of 78s (section 1272)—for stated interest on certain short-term consumer loans, from the Rule of 78s method to the constant yield method. See section 5.04 in the Appendix of Rev. Proc. 2002-9.

72. Original issue discount (sections 1272 and 1273)—to the principal-reduction method for de minimis original issue discount (OID). Attach the statement required by section 12.01(3) in the Appendix of Rev. Proc. 2002-9. Audit protection and scope limitations do not apply to this change. This change is made on a cut-off basis. See section 12.01 in the Appendix of Rev. Proc. 2002-9.

73. Market discount bonds (section 1278)—from including market discount currently in income for the tax year to which the discount is attributable to including market discount in income for the tax year of disposition or partial principal payment (revoking the section 1278(b) election). Attach the statement required by section 12A.01(4) in the Appendix of Rev. Proc. 2002-9. This change is made on a cut-off basis. See section 12A.01 in the Appendix of Rev. Proc. 2002-9.

74. Interest income on short-term obligations (section 1281)—to currently including accrued interest and discount in income (to comply with section 1281). The entire section 481(a) adjustment must be taken into account in the year of change. See section 13.01 in the Appendix of Rev. Proc. 2002-9.

75. Stated interest on short-term loans (section 1281)—for a bank using the cash receipts and disbursements method of accounting, from accruing stated interest on short-term loans made in the ordinary course of business to using the cash method to report such interest. Scope limitations do not apply to this change. The entire section 481(a) adjustment must be taken into account in the year of change. See section 13.02 in the Appendix of Rev. Proc. 2002-9.

76. Sales of mortgage loans (section 1286)—for accounting for certain sales of mortgage loans in which the seller also enters into a contract to service the mortgages in consideration for amounts received from interest payments, from a method that is inconsistent with Rev. Rul. 91-46, 1991-2 C.B. 358, to a method that is consistent with Rev. Rul. 91-46. However, the change is only an automatic accounting method change for certain taxpayers who are under examination. This change does not fall under the procedures of Rev. Proc. 2002-9. Instead, see Rev. Proc. 91-51, 1991-2 C.B. 779.

77. Environmental remediation costs (section 263A)—for costs incurred to clean up land that a taxpayer contaminated with hazardous waste from the taxpayer's manufacturing operations, to capitalizing such costs in inventory costs under section 263A. The applicant requesting this change and another automatic change under section 263A may file one Form 3115 to make both changes, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See Rev. Rul. 2004-18, 2004-8 I.R.B. 509.

78. Costs of intangibles and certain transactions (section 263(a))—for amounts paid or incurred to acquire or create intangibles, or to facilitate an acquisition of a trade or business, a change in the capital structure of a business entity, and certain other transactions, to a method of accounting provided in Regulations sections 1.263(a)-4, 1.263(a)-5, and 1.167(a)-3(b). For a tax year ending on or after December 31, 2005, or for an earlier tax year that is after the applicant's second tax year ending on or after December 31, 2003, see Rev. Proc. 2006-12, 2006-3 I.R.B. 310. For an applicant's second tax year ending on or after December 31, 2003, see Rev. Proc. 2005-9, 2005-2 I.R.B. 303, as modified by Rev. Proc. 2005-17, 2005-13 I.R.B. 797, which also provides, if the applicant desires, a change to utilize the 3½ month rule authorized by Regulations section 1.461-4(d)(6)(ii) or the

recurring item exception authorized by Regulations section 1.461-5. For information regarding the scope limitations and how to complete Form 3115, see Rev. Proc. 2006-12 or Rev. Proc. 2005-9, as modified by Rev. Proc. 2005-17. Compute the section 481(a) adjustment taking into account only amounts paid or incurred in tax years ending on or after January 24, 2002. See Rev. Proc. 2006-12 or Rev. Proc. 2005-9, as modified by Rev. Proc. 2005-17.

79. REMIC inducement fees (section 446)—for inducement fees received in connection with becoming holders of noneconomic residual interests in REMICS, to a safe harbor method provided under Regulations section 1.446-6(e)(1) or (e)(2). See Rev. Proc. 2004-30, 2004-21 I.R.B. 950.

80. "All events test" method for credit card annual fees (section 446)—to a method that satisfies the all events test in accordance with Rev. Rul. 2004-52, 2004-22 I.R.B. 973. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003. See Rev. Proc. 2004-32, 2004-22 I.R.B. 988.

81. Ratable inclusion method for credit card annual fees (section 446)—to the ratable inclusion method for credit card annual fees. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003. See Rev. Proc. 2004-32, 2004-22 I.R.B. 988.

82. Credit card late fees (section 1272)—to a method that treats credit card late fees as interest income that creates or increases OID on the pool of credit card loans to which the fees relate. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003. See Rev. Proc. 2004-33, 2004-22 I.R.B. 989.

83. Full inclusion method for certain advance payments (section 451)—to the full inclusion method as described in section 5.01 of Rev. Proc. 2004-34, 2004-22 I.R.B. 991. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003, provided the applicant's method of accounting for advance payments is not an issue under consideration for tax years under examination. The applicant must be using, or changing to, an overall accrual method of accounting. See Rev. Proc. 2004-34.

84. Deferral method for certain advance payments (section 451)—to the deferral method as described in section 5.02 of Rev. Proc. 2004-34, 2004-22 I.R.B. 991 (except as provided in section 8.03 and 8.04(2) of Rev. Proc. 2004-34). The applicant must be using, or changing to, an overall accrual method of accounting. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003, provided that the applicant's method of accounting for advance payments is not an issue under consideration for tax years under examination. In lieu of the information requested on line 1 of Schedule B of Form 3115, attach the information required in section 8.02(3) of Rev. Proc. 2004-34. An applicant requesting this change and designated automatic accounting method change number **30** (overall accrual method (section 446)), or **34** (overall accrual method (section 448)) (with or without designated automatic accounting method change number **35** (nonaccrual-experience method)), must file a single Form 3115 for all such changes. See Rev. Proc. 2004-34.

85. Film producer's treatment of certain creative property costs (section 446)—to account for creative property costs under the safe harbor method provided in Rev. Proc. 2004-36, 2004-24 I.R.B. 1063. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003. See Rev. Proc. 2004-36.

86. Timber fertilization (section 162)—for costs incurred by a timber grower for the post-establishment fertilization of an

established timber stand, **to** treat such costs as ordinary and necessary business expenses deductible under section 162. Scope limitations do not apply. See *Rev. Rul. 2004-62, 2004-25 I.R.B. 1072*.

87. Change in general asset account treatment due to a change in the use of MACRS property (section 168)—to the method of accounting provided in Regulations sections 1.168(i)-1(c)(2)(ii)(E) and 1.168(i)-1(h)(2). This change is made on a cut-off basis. See *Regulations section 1.168(i)-1(l)(2)(ii)*.

88. Change in method of accounting for depreciation due to a change in the use of MACRS property (section 168)—to the method of accounting provided in Regulations section 1.168(i)-4. See *Regulations section 1.168(i)-4(g)(2)*.

89. Depreciation of qualified non-personal use vans and light trucks (section 280F)—for certain vehicles placed in service before July 7, 2003, **to** a method of accounting in accordance with Regulations section 1.280F-6(f)(2). See *Regulations section 1.280F-6(f)(2)(iv)*.

90. Insurance companies' incentive payments to health care providers (section 832)—for deducting provider incentive payments, **to** the method of including those payments in discounted unpaid losses without regard to section 404. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2003. See *Rev. Proc. 2004-41, 2004-30 I.R.B. 90*.

91. Up-front network upgrade payments made to utilities (section 451)—**to** a safe harbor method provided in section 5.01 of *Rev. Proc. 2005-35, 2005-28 I.R.B. 76*. Scope limitations do not apply if the change is made for the applicant's first tax year ending on or after July 11, 2005, or for a prior year of change pursuant to section 6.03 of *Rev. Proc. 2005-35*. See *Rev. Proc. 2005-35*.

92. Allocation of environmental remediation costs to production (section 263A)—**to** a method that allocates under section 263A environmental remediation costs to the inventory produced during the tax year such costs are incurred. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending after February 6, 2004. An applicant that filed a Form 3115 on or before July 20, 2005, to comply with *Rev. Rul. 2004-18, 2004-8 I.R.B. 509*, for its first tax year ending after February 6, 2004, or was not required to change its method of accounting to comply with *Rev. Rul. 2004-18*, and files Form 3115 to comply with *Rev. Proc. 2005-42, 2005-28 I.R.B. 67*, for its first tax year ending after June 20, 2005, may effect the change using either a section 481(a) adjustment or a cut-off method. An applicant requesting this change and another automatic change under section 263A may file one Form 3115 to make both changes, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See *Rev. Rul. 2005-42*.

93. Election to not treat qualified New York Liberty Zone (Liberty Zone) leasehold improvement property as 5-year property for purposes of section 168 (sections 168 and 1400L(c))—for Liberty Zone leasehold improvement property placed in service by the applicant after September 10, 2001, during the 2000, 2001, 2002, 2003, or 2004 tax year, **to** elect not to use the 5-year recovery period or 9-year recovery period, as applicable, provided under section 1400L(c). This change must be filed with the applicant's federal tax return for the tax year that includes June 29, 2005, or with the applicant's federal tax return for the first tax year succeeding the tax year that included June 29, 2005. Scope limitations do not apply. See *Rev. Proc. 2005-43, 2005-29 I.R.B. 107*.

94. Credit card cash advance fees (section 1272)—**to** a method that treats credit card cash advance fees as creating or increasing OID on a pool of credit card loans that includes the cash advances that give rise to the fees. Scope limitations do not apply if the change is made for the applicant's first or second tax year ending on or after December 31, 2004. See *Rev. Proc. 2005-47, 2005-32 I.R.B. 269*.

95. Self-constructed tangible personal property produced on a routine and repetitive basis (section 263A)—for an applicant's first tax year ending on or after August 2, 2005, **from** accounting for mixed service costs under the simplified service cost method **to** a method that allocates such costs using reasonable factors or relationships under a direct reallocation method, a step-allocation method, or any other reasonable allocation method (as defined under the principles of Regulations section 1.263A-1(f)(4)) as provided in Regulations section 1.263A-1(g)(4), or **from** accounting for additional section 263A costs under the simplified production method **to** a facts-and-circumstances method as provided in Regulations section 1.263A-1(f), when the self-constructed assets are not produced on a routine and repetitive basis (mass-produced or the applicable recovery period of the property is longer than 3 years). Scope limitations do not apply. Audit protection does not apply if the applicant's method of accounting for mixed service costs or additional section 263A costs is an issue under consideration at the time the application is filed with the IRS National Office. The section 481(a) adjustment period is two tax years for a net positive adjustment. The applicant can request this change and designated automatic accounting method change numbers **77** (environmental remediation costs) and **92** (allocation of environmental remediation costs to production) on a single Form 3115, but must comply with the ordering rules of Regulations section 1.263A-7(b)(2). See *Temporary Regulations sections 1.263A-1T(h)(2)(i)(D) and 1.263A-2T(b)(2)(i)(D)*.

96. Replacement cost method for heavy equipment dealers' parts inventory (section 472)—**to** the replacement cost method for heavy equipment dealers' parts inventory described in *Rev. Proc. 2006-14, 2006-4 I.R.B. 350*. Complete Schedule D, Parts II and III, of Form 3115, as applicable. Audit protection and scope limitations do not apply in certain cases. This change is made on a cut-off basis. See *Rev. Proc. 2006-14*.

97. Depreciation of qualified revitalization building in the expanded area of a renewal community (section 1400I)—for a qualified revitalization building that is placed in service by the applicant after December 31, 2001, in the area of a renewal community that was expanded by the U.S. Department of Housing and Urban Development and for which the applicant receives a retroactive commercial revitalization expenditure allocation. This change applies only if the applicant filed the federal tax return for the placed-in-service year of that building on or before the date the applicant received the retroactive commercial revitalization expenditure allocation. This change must be filed with the applicant's federal tax return for the taxable year that includes the date on which the commercial revitalization agency makes the retroactive commercial revitalization expenditure allocation, or with the applicant's federal tax return for the first tax year succeeding the tax year that included the date on which the commercial revitalization agency made the retroactive commercial revitalization expenditure allocation. Scope limitations do not apply. See *Rev. Proc. 2006-16, 2006-9 I.R.B. 539*.

98. Insurance contracts acquired in an assumption reinsurance transaction (section 197)—for an applicant's first tax year ending after April 10, 2006, for certain acquisitions of insurance contracts that apply the rules of Temporary Regulations section 1.197-2T(g)(5)(ii) to transactions occurring prior to April 10, 2006, **to** comply with Regulations section 1.197-2(g)(5). This change does not apply if the applicant's proper treatment of any such property is an issue under consideration in an examination, before an Appeals office, or before a Federal court. Scope limitations do not apply. See *Regulations section 1.197-2(g)(5)*.

99. Elections to treat participations and residuals under the income forecast method (section 167(g))—for property

subject to the income forecast method under section 167(g) and placed in service by the applicant after October 22, 2004, to elect either **to** include in the adjusted basis of the property, participations and residuals expected to be paid before the end of the tenth tax year following the tax year in which the property is placed in service, or **to** exclude participations and residuals from the adjusted basis of the property and deduct the participations and residuals in the tax year that the participations and residuals are paid. This change applies only if, before June 15, 2006, the applicant filed its federal tax return for the tax year during which the property was placed in service. This change must be filed with the applicant's federal tax return for the first or second tax year ending on or after December 31, 2005. Scope limitations do not apply. See *Notice 2006-47, 2006-20 I.R.B. 892.*

100. **Election to treat the cost of any qualified film or television production as an expense (section 181)**—for any qualified film or television production subject to section 181 for which the applicant begins principal photography after October 22, 2004, but first paid or incurred costs of the production before October 23, 2004, **to** elect to treat the costs of the production as an expense, as provided for in section 181. This change applies only if, before June 15, 2006, the applicant filed its federal tax return for the tax year in which the costs of the production were first paid or incurred. This change must be filed with the applicant's federal tax return for the first or second tax year ending on or after December 31, 2005. Scope limitations do not apply. See *Notice 2006-47, 2006-20 I.R.B. 892.*

101. **Election to treat reforestation expenditures as expenses (section 194)**—for any qualified timber property, **to** elect to deduct reforestation expenditures paid or incurred after October 22, 2004, as provided for in section 194(b). This

change applies only if, before June 15, 2006, the applicant filed its federal tax return for the tax year in which the reforestation expenditures were paid or incurred. This change must be filed with the applicant's federal tax return for the first or second tax year ending on or after December 31, 2005. Scope limitations do not apply. See *Notice 2006-47, 2006-20 I.R.B. 892.*

102. **Election to treat certain desulfurization costs as expenses (section 179B)**—for a small business refiner (as defined in section 45H(c)(2)), **to** elect to deduct 75 percent of qualified capital costs (as defined in section 45H(c)(2)) paid or incurred after December 31, 2002, in tax years ending after that date. This change applies only if, before June 15, 2006, the applicant filed its federal tax return for the tax year in which the qualified capital costs were paid or incurred. This change must be filed with the applicant's federal tax return for the first or second tax year ending on or after December 31, 2005. Scope limitations do not apply. See *Notice 2006-47, 2006-20 I.R.B. 892.*

103. **Qualifying electric transmission transactions (section 451(i))**—for qualified gain from a qualifying electric transmission transaction, **to** recognizing all or part of the qualified gain ratably over the 8-year period beginning with the year that includes the date of the transaction, as provided in section 451(i). This change applies only if, before June 15, 2006, the applicant filed its federal tax return for the tax year in which the qualified electric transmission transaction occurred. This change must be filed with the applicant's federal tax return for the first or second tax year ending on or after December 31, 2005. Scope limitations do not apply. See *Notice 2006-47, 2006-20 I.R.B. 892.*

Privacy Act and Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. Section 446(e) says that you must obtain IRS approval before you change your method of accounting, except where otherwise provided. To obtain this approval, you are required to provide the information requested on this form. This information will be used to ensure that you are complying with the applicable laws, and to figure and collect the right amount of tax. Failure to provide all of the information requested may prevent processing of this form. Providing false information may subject you to penalties. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation, and to cities, states, and the District of Columbia for use in the administration of their tax laws. We may also disclose this information including giving it to Federal and state agencies to enforce Federal non-tax criminal laws and to combat terrorism.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for individual taxpayers filing this form is approved under OMB control number 1545-0074 and is included in the estimates shown in the instructions for their individual income tax return. The estimated burden for all other taxpayers who file this form is shown below.

Form	Recordkeeping	Learning about the law or the form	Preparing and sending the form to the IRS
3115	38 hr., 29 min.	19 hr., 54 min.	23 hr., 48 min.
Sch. A	3 hr., 21 min.	1 hr., 51 min.	3 hr., 11 min.
Sch. B	1 hr., 25 min.	30 min.	33 min.
Sch. C	5 hr., 1 min.	45 min.	2 hr., 4 min.
Sch. D	27 hr., 30 min.	1 hr., 59 min.	2 hr., 31 min.
Sch. E	3 hr., 49 min.	1 hr., 59 min.	2 hr., 8 min.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form simpler, we would be happy to hear from you. You can write to the Internal Revenue Service, Tax Products Coordinating Committee, SE:W:CAR:MP:T:T:SP, 1111 Constitution Ave. NW, IR-6406, Washington, DC 20224. Do not send the tax form to this office. Instead, see **When and Where To File** on page 2.
