

U. S. TREASURY DEPARTMENT
WASHINGTON 25

OFFICE OF
COMMISSIONER OF INTERNAL REVENUE

ADDRESS REPLY TO
COMMISSIONER OF INTERNAL REVENUE
AND REFER TO

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OCT 26 1951

Communications Workers of America
1808 Adams Mill Road, N. W.
Washington 9, D. C.

Gentlemen:

Reference is made to your letter dated July 5, 1951, in which you state that at your 5th Annual Convention you underwent an organizational and structural change and request a group ruling covering your local unions. Reference is also made to your letter dated October 10, 1951, with which you submitted an affidavit and lists of the subordinate districts and local unions chartered by you.

In Bureau rulings dated November 4, 1944, addressed to you under your former name (National Federation of Telephone Workers), and September 11, 1947, addressed to you under your present name, you were held to be exempt from Federal income tax under the provisions of section 101(1) of the Internal Revenue Code and corresponding provisions of prior revenue acts.

It is the opinion of this office, based upon the evidence presented, that you and your subordinate districts and local unions appearing on the lists submitted with your letter of October 10, 1951, are exempt from Federal income tax under the provisions of section 101(1) of the Code.

Accordingly, you and your subordinate organizations referred to above will not be required to file income tax returns so long as there is no change in your character, purposes, or method of operation or that of your subordinate organizations. Any such changes should be reported immediately to this Bureau in order that their effect upon your present exempt status and that of your subordinate organizations may be determined.

However, you and your subordinate districts and local unions are required to file annually information returns on Form 990 with the collectors of internal revenue for the respective districts in which located so long as the exemption remains in effect. This form may be obtained from the collector and is required to be filed on or before the fifteenth day of the fifth month following the close of your respective annual accounting periods.

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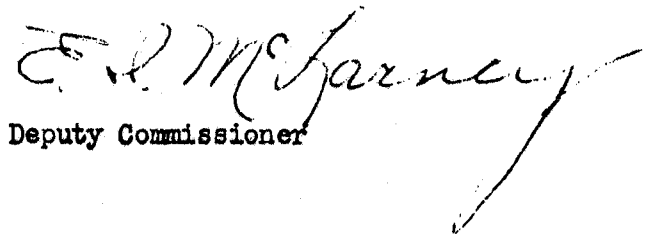
You should furnish the Bureau annually, on the calendar year basis, lists, in triplicate, showing the names, numbers and addresses of any new subordinate districts and local unions chartered by you during the year, and the names, numbers and addresses of any districts and local unions which for any reason ceased to exist. Such annual lists should be accompanied by a statement sworn to by one of your principal officers as to whether the information heretofore submitted by you, and on which this ruling is based, is applicable in all respects to the organizations appearing on the lists and should be forwarded so as to reach this office not later than February 15 of the following year.

Bureau rulings of November 4, 1944, and September 11, 1947, are hereby superseded by this ruling to include the various organizational and structural changes, which became effective as of April 2, 1951, made in your character and method of operation.

The collector of internal revenue for your district and the districts in which your subordinate districts and local unions appearing on the lists recently submitted are located are being advised of this action.

By direction of the Commissioner.

Very truly yours,


Deputy Commissioner