

Internal Revenue Service
District Director

Department of the Treasury

Date: October 11, 1983

Entered in PCG

Our Letter Dated: February 4, 1982

Person to Contact: Taxpayer Service

Contact Telephone Number: (301) 962-2590

Institute For International Economics
1700 Pennsylvania Avenue, Suite 300
Washington, DC 20006

Dear Sir or Madam:

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Internal Revenue Code, because you are an organization of the type described in section *See below. Your exempt status under section 501(c)(3) of the Code is still in effect.

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, a grantor or a contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of section *See below status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section *See below organization.

Because this letter could help resolve any questions about your private foundation status, please keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours,



Teddy R. Kern
District Director

*509(a)(1) & 170(b)(1)(A)(vi)