

**Internal Revenue Service**

Washington, DC 20224

Entered in PGC

Date:

MAR 10 1970

In reply refer to:

T:MS:EO:R:2-MR

University Centers for Rational
Alternatives, Inc.
110 West 40th Street, Room 1804
New York, New York 10018

Gentlemen:

Based on information supplied, we rule that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. This ruling assumes your operations will be as stated in your exemption application.

In this letter we are not determining whether you are a private foundation as defined in new section 509(a) of the Code. Your attention is invited to new section 508(b) of the Code which sets forth requirements for establishing that an organization exempt under section 501(c)(3) is not a private foundation. When procedures are developed to implement these new requirements, we will advise you how to proceed to notify the Internal Revenue Service if you do not believe yourself to be a private foundation.

For years beginning prior to January 1, 1970, you are required to file the annual information return, Form 990-A. For each subsequent year, please refer to the instructions accompanying the Form 990-A for that particular year to determine whether you are required to file. If filing is required, you must file the Form 990-A by the 15th day of the fifth month after the end of your annual accounting period which ends December 31.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any of your present or proposed activities is unrelated trade or business as defined in section 513 of the Code.

University Centers for Rational
Alternatives, Inc.

You are not liable for Federal unemployment taxes. You are liable for social security taxes only if you have filed waiver of exemption certificates as provided in the Federal Insurance Contributions Act. (Your District Director will be glad to tell you more about the latter point.)

Donors may deduct contributions to you, as provided by section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to or for your use are deductible for Federal estate and gift tax purposes under sections 2055, 2106, and 2522 of the Code.

If you change your purposes, character, or method of operation, please let your District Director know, so that he may consider the effect on your exempt status. Also, please keep him informed of any changes in your name or address.

You need an employer identification number, even if you don't have any employees. This number is to be used on all your tax returns and in your correspondence with the Internal Revenue Service. If you don't have such a number, please file Form SS-4, Application for Employer Identification Number, with your District Director.

We are informing your District Director Manhattan, New York, of this ruling.

Thank you for your cooperation.

Sincerely yours,

John R. Barber
Chief, Rulings Section
Exempt Organizations Branch