§ 301.9001–3

(c) “Person” means an individual, firm, corporation, association, partnership, consortium, joint venture, or governmental entity.

(d) “Outer Continental Shelf” means all submerged lands lying seaward and outside of the area of lands beneath navigable waters as defined in section 1301 of title 43 and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control;

(Sec. 302(d) of the Outer Continental Shelf Lands Act Amendments of 1978 (92 Stat. 672) and sec. 7805 of the Internal Revenue Code of 1954 (68A Stat. 917; 26 U.S.C. 7805))

[T.D. 7697, 45 FR 33976, May 21, 1980]

§ 301.9001–3 Cross reference.

See the Coast Guard regulations under 33 CFR parts 135 and 136 for rules relating to the implementation of the Act.

(Sec. 302(d) of the Outer Continental Shelf Lands Act Amendments of 1978 (92 Stat. 672) and sec. 7805 of the Internal Revenue Code of 1954 (68A Stat. 917; 26 U.S.C. 7805))

[T.D. 7697, 45 FR 33976, May 21, 1980]

§ 301.9100–0 Outline of regulations.

This section lists the paragraphs in §§301.9100–1 through 301.9100–3.

§ 301.9100–1 Extensions of time to make elections.

(a) Introduction.

(b) Terms.

(c) General standards for relief.

(d) Exceptions.

(e) Effective dates.

§ 301.9100–2 Automatic extensions.

(a) Automatic 12-month extension.

(1) In general.

(2) Elections eligible for automatic 12-month extension.

(b) Automatic 6-month extension.

(c) Corrective action.

(d) Procedural requirements.

(e) Examples.

§ 301.9100–3 Other extensions.

(a) In general.

(b) Reasonable action and good faith.

(1) In general.

(2) Reasonable reliance on a qualified tax professional.

(3) Taxpayer deemed to have not acted reasonably or in good faith.

(c) Prejudice to the interests of the Government.

(1) In general.

(2) Lower tax liability.

(3) Closed years.

(4) Special rules for accounting method regulatory elections.

(5) Special rules for accounting period regulatory elections.

(d) Effect of amended returns.

(1) Second examination under section 7605(b).

(2) Suspension of the period of limitations under section 6501(a).

(e) Procedural requirements.

(1) In general.

(2) Affidavit and declaration from taxpayer.

(3) Affidavits and declarations from other parties.

(4) Other information.

(5) Filing instructions.

(f) Examples.