

Private Letter Ruling 8947014, IRC Section 42

August 23, 1989

This is in reply to your letter dated May 12, 1988, and subsequent correspondence requesting a private letter ruling under section 42 of the Internal Revenue Code. The facts, as you have represented them, are as follows.

In 8 A and B, who are husband and wife, purchased or acquired Building 1, Building 2, Building 3, and Building 4 located in City C. The four buildings were acquired and placed in service on the following dates as residential rental housing for low-income individuals:

Building Date acquired Date placed in service