

Significant [Private Letter Rulings](#) for Government Relations Committee Meeting Discussion

1. PLRs [201527012](#) and [201527013](#) (counteracting hedges will not constitute gross income for REIT gross income tests)
2. [PLR 201530014](#) (section 857(d)(3) applies to a liquidating distribution by a REIT to its shareholders)(
3. [PLR 201609004](#) (sale of REIT's assets pursuant to a plan of liquidation will not constitute prohibited transactions)