OTT Operating Memo No. 00-1 Enclosure 1 5/24/00

## **Definitions**

Basic Research Agreement

As defined in IRS Revenue Procedure 97-14, any original investigation for the advancement of scientific knowledge not having a specific commercial objective. For example, product testing supporting the trade or business of a specific nongovernmental person is not treated as basic research.

IRS Revenue Procedure

An official statement of a procedure that either affects the rights or duties of taxpayers or other members of the public under the Internal Revenue Code and related statutes and regulations.

Private Activity Use

86 Tax Act category of use that serves to identify arrangements that have the potential to transfer the benefits of tax-exempt financing, as well as arrangements that actually transfer these benefits, to non-governmental persons.

Private Business Use

The direct or indirect use of proceeds from an issued bond in a trade or business of a non-governmental person.

Private Business Use Test

An IRS-prescribed test to determine if the use of a bond's proceeds qualify as the private business use of a financed property.

Safe Harbors

Specific legal exemptions promulgated by the IRS under which an exemption is provided from specific rules and tests contained in the Code and IRS regulations, provided certain qualifications are met.