



De Filipp's

LIFO LOOKOUT

A Quarterly Update of LIFO - News, Views and Ideas

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LIFO UPDATE

If you had called me personally to ask "What's happening lately with LIFO that I need to know about?" ... Here's what I'd say:

#1. BARGAIN PURCHASE LIFO INVENTORIES: AN UNEXPECTED, TOO-GOOD-TO-BE-TRUE, BONANZA? There have been some new developments involving *LaCrosse Footwear, Inc.*, the case we reported a year ago in the June, 1997 *LIFO Lookout*.

In this case, the IRS seemingly defeated an attempt by *LaCrosse* to apply LIFO to obtain major tax deferral benefits from the bargain purchase it made of its opening inventory. Although the U.S. Court of Federal Claims disagreed with the IRS rationale, it nevertheless appeared to prevent the taxpayer from enjoying LIFO bargain purchase deferral benefits.

It seemed that *LaCrosse* simply added more support to the IRS denial of LIFO benefits to taxpayers in initial inventory bargain purchase situations. But the Court threw in its own views on (1) the importance of the distinction between a **new entity** versus an entity already in existence that is making the acquisition and (2) the presumption Congress intended that an arm's-length market price was to be used as the basis for the opening inventory.

Now, in a May, 1998 updated decision on *LaCrosse*, these views may result in the IRS winning the battle ... but losing the war.

As discussed on page 3, *LaCrosse* now appears to receive a stepped-up basis for its opening inventory, such that the benefit of the bargain purchase is never realized as income or taxed. This happens when it establishes its base year cost of the bargain purchase inventory at fair market value. Wow! ... Some of us can hardly believe this result. But, we'll take it...unless, of course, the Court reconsiders its conclusion or otherwise severely limits its application. If not, or until then, some bargain purchases may turn out to be even greater bargains than anyone ever thought.

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#2. WHATEVER HAPPENED TO THE DISPUTE OVER PARTS INVENTORIES, LIFO & THE USE OF REPLACEMENT COST ACCOUNTING?

Don't worry ... it hasn't gone away. It's just that the Tax Court still has not issued its decision in the case where the IRS challenged a dealer's use of the generally accepted replacement cost method for valuing its parts and accessories inventories on LIFO.

Be assured that the outcome will affect all auto and truck dealers and many other businesses who use replacement cost for their parts inventories. The last substantive discussion on this issue was Letter Ruling 9433004 which was written up in the September, 1994 *LIFO Lookout*.

#3. NEW ITEMS FOR DECEMBER 31, 1997 YEAR-END LIFO COMPUTATIONS. We are now able to provide a comparison of our new item lists with those issued by the Motor Vehicle Industry Specialist of the Internal Revenue Service. In our last issue, we published our own current new items list along with a comparison for the comparable previous two years-end: December 31, 1995 and 1996. This

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LIFO Update

highlighted the changes **by make and by model** over a three year period.

For some dealers—and this varies by year—significant differences can result in the size of LIFO reserve increases or decreases depending on the treatment of key new items and the actual mix of vehicles on hand at the end of the year. Our comments beginning on page 11 highlight major differences for Ford, Subaru, Volvo and Volkswagen, and the side-by-side comparison of our respective lists begins with the summary table on page 14.

#4. LIFO CONFORMITY VIOLATIONS ON FACTORY FINANCIAL STATEMENTS.

May 31 was the deadline for the first (one-third) installment of the LIFO Conformity penalty payment for auto dealers with violations on Factory statements in any of the years 1991 through 1996. The remaining two payments are due on January 31, 1999 and January 31, 2000.

Dealers on LIFO were required to conduct self-audits to determine if LIFO conformity violations were committed in any one of those years. If the dealer did not have a LIFO conformity violation during that six-year period, it was safe and there was no need to pay for *relief*.

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If the self-audit ferretted out a LIFO conformity violation during any one of the six most recent taxable years ending on or before October 14, 1997 (i.e., for the calendar years 1991-1996), the dealer's choices came down to three grim alternatives.

1. **Pay** the first 1/3 of the settlement fee and file a memorandum statement by May 31, 1998,

2. **Play** "IRS audit roulette," and hope that the IRS might not catch the violation (not a very good alternative and hopefully few dealers were tempted unduly on this point), or

3. **Run away:** i.e., terminate the LIFO election before May 31, 1998 (also not a very good alternative and hopefully even fewer dealers were tempted to cut off their noses to spite their faces on this point).

Now that May 31 has come and gone, what will the IRS be doing after it finishes counting its blood-money and tallying up who has filed and who hasn't?

Will there be more audits, compliance checks, squabbles over "reasonable estimates"? ... Will the IRS sit back contented with its "windfall." Or is it planning to come out aggressively and look for more? Time will tell... and we'll be on the "look-out" to keep you up to date.



STATE INCOME TAX CONSEQUENCES OF PAYING THE LIFO CONFORMITY PENALTY TAX TO THE IRS

CALIFORNIA GIVES DEALERS A PASS

We recently reported that most of the states are not planning to exact any additional tax from auto dealers who pay the Federal LIFO conformity penalty tax. However, at that time, several states had "reserved" their decision on the matter.

California has recently advised that it will not impose any special taxes of its own on dealers for past LIFO conformity violations cured by complying with Revenue Procedure 97-44 and paying the IRS penalty tax.

In FTB Notice 98-10 dated June 5, 1998, the California Franchise Tax Board announced that it will allow dealers who qualify for relief under Revenue Procedure 97-44 "to continue to use the LIFO method if they attach a copy of the memorandum furnished to the IRS under Section 5 of Revenue Procedure 97-44 to their franchise or income tax return for the accounting period which includes May 31, 1998." Furthermore, no payment of any settlement amount to California will be required.

Accordingly, preparers of tax returns to be filed with California for a reporting period including May 31, 1998 should not forget to include a copy of the memorandum previously filed with the IRS National Office with their California returns.



LIFO & BARGAIN PURCHASE INVENTORIES

KOHLER & LaCROSSE FOOTWEAR ... UPDATED ... WITH A SURPRISE WINDFALL

The June, 1997 issue of the *LIFO Lookout* contained several articles on the subject of LIFO and new business bargain purchases. One article discussed *LaCrosse Footwear, Inc., v. US* (79 AFTR 2nd 97-857), in which the U.S. Court of Federal Claims in April of 1997 upheld the IRS in preventing the taxpayer from enjoying \$3 million worth of bargain purchase LIFO benefits in a 1982 transaction.

That issue of the *LIFO Lookout* also included discussions of the pre-1996 LIFO bargain purchase cases involving *Hamilton Industries, Inc.* (97 T.C. 120 (1991) and *Kohler Co. & Subsidiaries* (U. S. Court of Federal Claims, 34 Fed.CL.379 (1995)), the Coordinated Issue Paper on bargain purchases of inventory released by the IRS in September of 1995 and a Practice Guide or Checklist on "Considerations In Evaluating Exposure In Bargain Purchase Situations."

KOHLER APPEAL RELIES ON HAMILTON & UPHOLDS IRS—SEPTEMBER, 1997

Since June of 1997, two developments have occurred. The U. S. Court of Appeals for the Federal Circuit, on September 17, 1997, affirmed the appeal from the U. S. Federal Court of Claims involving *Kohler Co. & Subsidiaries* (Docket No. 96-5043). In

this appeal, the Court held that (1) the IRS was not unreasonable in its determination that Kohler's 1984 income was not clearly reflected through the use of LIFO and (2) that the IRS' adjustment to Kohler's income for the year was not barred by the Section 6501(a) statute of limitations.

At the time of the IRS audit, Kohler's 1978 tax year was closed for assessment purposes by the statute of limitations which generally requires adjustment by the IRS within three years after the tax return was filed. Kohler unsuccessfully argued that the IRS adjustments to undo the LIFO bargain purchase result could not be made because Section 481(a) should not override the Section 6501(a) statute of limitations when the proposed adjustment relates to one isolated transaction.

The Court of Appeals found the Tax Court's reasoning in *Hamilton Industries* to be persuasive and accepted its specific holding that "a change in the method of valuing closing inventory constitutes a change in method of accounting to which Section 481(a) applies." Furthermore, the fact that the bargain purchase LIFO application relates to only a single isolated transaction did not defeat the application of Section 481 where... "the transaction affected

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HAMILTON INDUSTRIES, INC ... U.S. TAX COURT - 1991

IRS COORDINATED ISSUE PAPER ... SEPTEMBER, 1995

KOHLER CO. & SUBSIDIARIES
NOVEMBER 3, 1995
U.S. COURT OF FEDERAL CLAIMS
IRS wins; taxpayer loses

LaCROSSE FOOTWEAR, INC
& INTERNATIONAL FOOTWEAR, CORP
APRIL 25, 1997
U.S. COURT OF FEDERAL CLAIMS
IRS wins ... but Court wants briefs

KOHLER CO. & SUBSIDIARIES
SEPTEMBER 17, 1997
U.S. COURT OF APPEALS
FOR THE FEDERAL CIRCUIT
AFFIRMS: IRS wins; taxpayer loses

BRIEFS FILED

LaCROSSE FOOTWEAR, INC
& INTERNATIONAL FOOTWEAR, CORP
MAY 15, 1998
U.S. COURT OF FEDERAL CLAIMS
IRS wins ... but base inventory set at FMV



the LIFO index, which in turn, affected the reflection of income in subsequent years."

The Court of Appeals further noted that its task was not to determine whether, in its own opinion Kohler's method of accounting "clearly reflected income," but rather its task was to determine "whether there is an adequate basis in law for the Commissioner's conclusion that it did not." In this regard, the Court determined that there was an adequate basis for the IRS' conclusion that Kohler's use of the LIFO accounting method did not clearly reflect income when it treated the reduced price inventory (i.e., the goods purchased at a bargain price) as the same "item type" as subsequently manufactured and otherwise identical goods.

After reviewing all the cases cited, the Court of Appeals concluded that the lower Court was correct in relying on the Tax Court's decision in *Hamilton Industries*. In both *Hamilton Industries* and *Kohler*, the taxpayer sought to fill its inventory with goods purchased at a steep discount, and then replaced them with goods purchased and produced at higher cost...The Tax Court in *Hamilton Industries* did not rely, as Kohler suggests, on the arbitrary nature of the discount value, but rather on the fact that the use of LIFO was not only compensating for inflation, but (also) was permitting the taxpayer to postpone gains associated with bargain priced inventory.

The Tax Court had concluded that "if factors other than inflation enter into the cost of inventory items, a reliable index cannot be computed." Still quoting from *Hamilton*, it added that "if changes in mix of the inventory result in the substitution of more expensive goods for less expensive goods, the treatment of those goods as a single item decreases taxable income because the increase in inventory costs is eliminated from the LIFO cost of goods as if such cost increase represents inflation. A narrower definition of an item within a pool will generally lead to a more accurate measure of inflation (i.e., price index) and thereby lead to a clearer reflection of income."

The Tax Court had also said in *Hamilton Industries* that even if a method of accounting comports with generally accepted accounting principles, consistently applied, where such method does not clearly reflect income, such method, will not control for tax purposes.

APPEALS DECISION IN KOHLER (1997) RESULTS IN MAY, 1998 LaCROSSE UPDATE

On April 25, 1997, the U.S. Court of Federal Claims (Judge Diane Gilbert Weinstein) had issued an unpublished opinion on *LaCrosse Footwear, Inc.*,

v. US (Docket No. 93-722T). In this case, the Court upheld the IRS disallowance of LaCrosse's LIFO accounting treatment for bargain purchase inventory because the taxpayer erroneously used the bargain price, rather than the market value, for its base-year inventory costs.

After the issuance of this opinion, the Court requested the filing of supplementary briefings solely on the issue of whether the base-year costs of items entering the inventory in the base-year should be set at the (lower) bargain cost amount or at the (higher) fair market value. Also, after the April, 1997 *LaCrosse* opinion, the Federal Circuit issued its decision in *Kohler Co. & Subs* (124F.3d 1451, 1456-579Fed.Cir. 1997) in which it was held that Kohler's dollar-value LIFO method for an opening inventory purchased at a substantial discount did not clearly reflect income where Kohler had treated its opening inventory as the same "item" as identical goods acquired later at full market price.

Apparently, the parties in *LaCrosse* did not request to brief the effect of *Kohler*, which was decided after the parties in *LaCrosse* had briefed the base-year cost issue.

In the May 15, 1998 *LaCrosse* update decision, the U.S. Court of Federal Claims/Judge Weinstein stated that the Federal Circuit's decision in *Kohler* constrains "this Court" to conclude that the IRS disallowance of LaCrosse's accounting method was not an abuse of discretion by the Commissioner, and that when LaCrosse did not place its opening inventory acquired as a bulk bargain purchase in separate item categories from identical goods subsequently purchased at full (market) price, the result did not clearly reflect income.

In Judge Weinstein's May 15, 1998 decision, she observed that *Kohler* did not address the issue raised in her earlier (April, 1997) opinion, namely, "how to set the base-year cost of the items purchased in the bargain purchase." Neither the Federal Circuit nor the Court of Federal Claims opinions in *Kohler* indicated which specific dollar-value LIFO accounting method (such as double-extension, index or link-chain method) was used in that case. Judge Weinstein concluded that "the Court correctly decided this issue in its earlier decision and that a taxpayer using the dollar-value, double extension LIFO method is required to set the base-year cost of items entering its inventory in the base-year at the fair market value of those items...rather than at the (bargain) cost."

For non-tax purposes, LaCrosse had valued its inventory at approximately \$5.8 million, whereas the actual cost to LaCrosse (per the allocation agree-

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LIFO & Bargain Purchase Inventories...

ment) of the bargain purchase inventory was only \$1.9 million and this amount was 33% of, or 67% less than, its market value.

Interestingly, there is no further discussion in the May, 1998 *LaCrosse* update decision regarding the possible lack of arm's-length dealings between buyer and seller. Only the technical discussions relative to the LIFO regulations are presented. The Court reaffirmed its conclusion that a new taxpayer first electing LIFO must calculate the base-year cost of the bargain purchase inventory at the fair or market value of those items at the beginning of its first taxable year, not at the taxpayer's (lower) actual bargain cost.

The Court concluded that the more general LIFO regulation (1.472-2(b)) which states that "inventory shall be taken at cost regardless of market value" did not apply since the regulations specifically excepts computations under another regulation which controls computations with respect to the "dollar-value" method (1.472-8(e)(2)). The Court further noted that no express guidance could be found as to how to set the base-year "cost" of items or other inventory entering at the beginning of the first taxable year for a new taxpayer, since the regulation measures only the cost of new items entering after the base date. For such inventory, the Regulation (1.472-8(e)(2)) provides that current-year cost is the measure of cost of a new item unless the taxpayer reconstructs its cost on the base date (the first day of the taxable year that the pool was created).

Once again, Judge Weinstein revisited her April, 1997 conclusion that the dollar-value LIFO regulation in question relied upon certain presumptions that, if accepted do "otherwise provide". The first is that the base-year cost will be based either on an approximation of current market value, ...or on an historical (reconstructed) market value. The second presumption is that the higher cost in a period of rising costs is the taxpayer's current-year cost, and that this presumptively will be imposed in lieu of a lower cost, unless the taxpayer is able to reconstruct the lower cost. (Reg. Sec. 1.472-8(e)(2)(iii)).

Finally, the Court concluded that the use of the fair market value of the inventory as its base-year cost was the approach most consistent with generally accepted accounting principles or GAAP, and therefore, ordinarily this would be the most accurate method for a clear reflection of income.

The Court noted that Accounting Principles Board Opinion No. 16 requires that the base-year cost for this inventory be stated at fair or market value. The Court also observed that the AICPA accounting rules

(Continued)

reflected in APB Op. No. 16 require that the "fair value" at the acquisition date of such bargain purchased goods be reflected on a company's financial statements; and, it further requires that if the fair market value exceeds the cost, then negative goodwill (a deferred credit) should be recorded and amortized.

According to the Court, based on (1) the language and logical effect of the regulations, (2) the GAAP principles and (3) no apparent grounds for valuing bargain opening inventory differently than bargain inventory acquired in subsequent years, it followed that the bargain purchase items were required to be valued at their (higher) fair market value as of the first day of *LaCrosse's* first taxable year, rather than at their (lower) bargain cost.

In its April, 1997 decision, the Court observed that *LaCrosse* apparently had violated a LIFO reporting conformity requirement because it used the bargain price of the inventory acquired from Rubber Mills to determine its tax liability, while using the fair market value of that inventory in its financial statements (with the tax method calculation appearing only as a footnote in the financial statements).

This observation was incorrect because *LaCrosse's* asset purchase fell within the "business combination" exception to the conformity reporting requirements. In the case of a business combination, taxpayers may use a different method for valuing inventory and allocating basis in their financial statements from that used for Federal income tax purposes. The IRS has interpreted the term "business combination" to include business combinations discussed in APB Op. No. 16, which discusses the "purchase method" business combination where one company acquires the assets and liabilities of another, resulting in new ownership of the business.

THE FACTS IN *LaCROSSE*

Before discussing the "unexpected windfall" aspects of Judge Weinstein's 1998 update, a brief review of the facts in *LaCrosse* and some of the judge's technical analysis and interpretation of the LIFO regulations is in order.

In 1982, some of the members of the management and ownership group of Rubber Mills, Inc. formed a new tax entity, *LaCrosse*, which purchased all of Rubber Mills' assets for \$7.5 million. The purchase transaction was consummated on June 21, 1982, effective as of May 1, 1982. According to the seller's financial statements, the book value for the assets sold was approximately \$10.6 million, of which approximately \$4.1 million was inventory, \$2.1 mil-

see **LIFO & BARGAIN PURCHASE INVENTORIES**, page 6



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lion was for plant, property and equipment, and the balance was principally for accounts receivable.

As part of the overall transaction, the buyer and seller signed an "allocation agreement" providing that, for tax purposes, LaCrosse would assign to the cash and accounts receivable a tax basis equivalent to their full book value to Rubber Mills and, for tax purposes, \$1.9 million would be allocated to inventory. The parties did not bargain over the allocation agreement.

For both tax and accounting purposes, LaCrosse elected the dollar-value, double extension LIFO inventory method for its first taxable year ending April 30, 1983. It also elected to use the "earliest acquisitions during the year" method for determining current year inventory cost when valuing closing inventory. It set up two LIFO pools: (1) a natural business unit (NBU) pool for manufactured goods and (2) a purchased goods pool.

After the acquisition, LaCrosse operated essentially as Rubber Mills had, and it used the same employees, plant and equipment to manufacture, purchase and sell the same types of footwear. Although both companies used the LIFO method to value their inventories, LaCrosse used two inventory accounting pools, a natural business unit (NBU) pool for manufacturing and another one for wholesaling; whereas Rubber Mills had used only one NBU pool.

LaCrosse placed in its manufactured pool two types of goods. The first was the goods used or produced in Rubber Mills' manufacturing process (raw materials, work-in-process, and a very large volume—representing \$3.8 million of the \$5.4 million FIFO book value of Rubber Mills' manufacturing pool—of finished manufactured goods). The second type was the (identical) goods LaCrosse subsequently manufactured, or used in manufacture.

In its purchased goods pool, LaCrosse placed (1) the finished goods purchased for resale by Rubber Mills (a small dollar quantity, \$440,000) and (2) those goods purchased subsequently by LaCrosse for resale (also a relatively small amount).

The IRS audited LaCrosse's 1983 return in 1986. During that audit it challenged LaCrosse's valuation of the base-year cost of its inventories at the bargain purchase price. The Service's contention was that goods obtained in a bulk purchase immediately after a taxpayer's incorporation may not be treated as opening inventory, but rather they should be treated as the first acquisition. It also required LaCrosse to place the finished goods portion of the bargain bulk purchase inventory into LaCrosse's purchased pool. LaCrosse agreed to increase its base-year cost

(Continued from page 5)

valuation by \$1.5 million (from \$1.9 million to \$3.4 million) and, correspondingly, reduce its "cost of goods sold."

LaCrosse paid the tax and interest in 1987 and filed amended returns seeking a refund in 1989 based on the decision in *UFE, Inc. v. Commissioner*, 92 T.C. 1314 (1989), which upheld another taxpayer's position in similar circumstances. (The Service has never acquiesced to the Tax Court's position in *UFE*.)

The evidence did not support LaCrosse's contention that it had engaged in a fully arm's-length transaction. There were extensive overlaps and numerous familial relationships between the directors, officers, and owners of the two buying and selling groups.

In addition, the company was on the market for only a relatively brief period of time when a valuation report, based on liquidating values, was issued. Absent consideration of other accepted valuation criteria such as replacement cost, sales comparison, or income analysis methods, the Court considered the appraisal based on liquidating values to be highly questionable.

Finally, the only business justification LaCrosse offered for the sale appeared weak to the Court, and the taxpayer had presented insufficient evidence to dispel the conclusion that the true purposes driving the sales were other tax-related considerations.

The IRS had raised two principal arguments against the use of LaCrosse's LIFO methods. The first argument was that the goods LaCrosse subsequently (after the purchase of Rubber Mills) purchased, whether for resale or for use in the manufacturing process, must be treated as different classes of goods ("items") from the identical goods acquired earlier from Rubber Mills, because of the significant price differential between the bargain cost of the acquired goods and the (market) cost of the goods it subsequently bought or manufactured. The IRS's second argument was that all of the inventory purchased at a bargain from Rubber Mills, including what would have been Rubber Mills' manufactured inventory, belonged in LaCrosse's purchased goods pool.

The IRS argued that LIFO accounting treatment is intended to compensate only for the effects of inflation on the out-of-pocket costs a merchant or manufacturer must incur each year in order to merely maintain his current inventory levels ... LIFO is not intended to permit a one-time bargain purchase price to shelter indefinitely a taxpayer's subsequent in-hand income unrelated to inflation. The IRS argued that LaCrosse's item and pooling treatments allowed it to defer, through each succeeding year that the

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goods comprising that "item" or pool of inventory were not liquidated (i.e., so long as LaCrosse kept its year-end inventories up to prior levels), any recognition and taxation of actual income or "profit" from this bargain purchase.

For a thorough discussion of the two arguments raised by the IRS involving the different "item" nature of the bargain purchased goods and the "pooling" aspects, see the write-up of *LaCrosse* in the June, 1997 *LIFO Lookout*. As discussed previously, the Court rejected both of the IRS "item" and "pooling" technical arguments ... but it nevertheless upheld the disallowance of LaCrosse's LIFO method of accounting because its use of the bargain price for base-year LIFO inventory cost does not clearly reflect income.

"ITEM" TREATMENT

... A TECHNICAL DISCUSSION

In her discussion of the "item" treatment aspects of the case, Judge Weinstein observed that the Federal Circuit in *Kohler* had held that the IRS did not abuse its discretion in determining that Kohler's LIFO method did not clearly reflect income, and it had held that the bargain purchase inventory must be treated as a different item from identical goods acquired or manufactured afterward at greater cost. However, "Under *Kohler*, the creation of a new item based on increased cost is required when the price increase causes the prices to be 'greatly disparate' ... (i.e., there is a different item if the increase is 'substantial' and/or 'material'). However, these terms are not quantified.

"The consequence of placing bargain items in separate item categories from identical—but subsequently purchased—goods is that the bargain items are treated as having been sold first. In other words, (separate) 'item' treatment reverses the normal presumption of LIFO inventory accounting, ... and instead imposes a FIFO-type approach to the bargain goods, while retaining a LIFO approach for all other goods entering the inventory after the base year."

The Court in *LaCrosse* disagreed with the reasoning in *Kohler* because that *Kohler* reasoning "endorses the imposition of ad hoc unquantified standards that give insufficient notice and guidance to permit a taxpayer to plan its business operations in light of its tax liability. Moreover, the (*Kohler*) decision ignores the practical difficulties inherent in creating a new item classification, and separately tracking the new items, every time there is a price difference (of uncertain magnitude)." The Court in *LaCrosse* is of the opinion that the dollar-value, double-extension LIFO inventory accounting rules

(Continued)

were designed to eliminate such tracking based on comparing only to aggregate costs, base-year and year-end. Nevertheless, *Kohler* after September, 1997 became binding precedent on *LaCrosse*. Thus, plaintiff (*LaCrosse*), which acquired its opening inventory at a discount of 67% (a larger discount than the 50% discount in *Kohler*), must place the goods acquired from Rubber Mills in separate item categories from the identical goods subsequently acquired for manufacture (at full market price), manufactured or purchased for resale, as the case may be, by *LaCrosse*.

DETERMINATION OF "BASE-YEAR COSTS"

... A TECHNICAL DISCUSSION

Judge Weinstein observed that while deciding the "item" issue in favor of the IRS, the September, 1997 decision in *Kohler* did not resolve all of the issues involved in determining the taxpayer's taxable income for the years under consideration. The Federal Circuit in *Kohler* was not presented with, and did not have to decide, whether a taxpayer using the double-extension, dollar-value LIFO method must set the base-year cost of the goods purchased as part of a bulk purchase of inventory in the base-year at the bargain cost or at the fair-market value at the time of purchase. Similarly, neither Court involved with *Kohler* took testimony on the intricacies of the LIFO computation sub-methods at trial because counsel had agreed that such testimony was unnecessary for purposes of resolving the *Kohler* dispute.

In the April, 1997 decision on *LaCrosse*, the Court stated that the question of how to set the base-year "cost" of items **first** entering the **new taxpayer** *LaCrosse's* opening inventory during its **first** taxable year is not answered by the tax rules. The general LIFO regulation which states that "inventory shall be taken at cost regardless of market value" specifically excepts computations under Section 1.472-8 "with respect to the 'dollar-value' method." This leaves Reg. Sec. 1.472-8(e)(2) as the specific rule for dollar-value, double-extension LIFO, and specific rules are to be given precedence over general rules.

Note, however, that the dollar-value, double-extension LIFO regulation measures only the cost of new items entering the pool **AFTER** the base date: it provides no express guidance as to how to set the base-year "cost" of items or other inventory entering the pool **AT** the beginning of the first taxable year **for a new taxpayer**. For such inventory, the regulation states that current-year cost is the measure of cost of a new item unless the taxpayer reconstructs its cost on the base date, i.e., the first day of the taxable year that the pool was created.

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Purportedly relying on this rule, LaCrosse looked to the three measures for current-year cost and selected "first acquisition cost," i.e., the bargain purchase cost. However, this rule, by its terms, is not applicable to a new taxpayer's opening inventory on its base date; it is applicable only to new items entering an existing taxpayer's inventory after the base date.

PRESUMPTIONS in the dollar-value LIFO regulation:

1. Base-year cost will be based either on an approximation of current MARKET value, determined by actual current-year purchase cost (whether first acquisition, average cost or latest purchase) or on an historical (reconstructed) MARKET value.

2. The HIGHER cost (in a time of rising costs, such as would prompt a LIFO election in the first place) is the taxpayer's current-year cost. Furthermore, this higher cost will presumptively be imposed in lieu of a lower cost, **UNLESS** the taxpayer is able to reconstruct the lower cost.

3. Finally, all the current-year cost measures reflect **actual** cost to the taxpayer as determined by actual **arm's-length** purchases. If so, they must reflect current-year fair market value. If the taxpayer wishes to use an even lower figure than its best actual arm's-length current-year cost measure to establish base-year cost, the taxpayer bears the burden of reconstructing the (market) cost on the base date. Thus, the regulation does not appear to contemplate the circumstance urged by LaCrosse, that the current-year cost—and thus the base-year cost—for a new item would be LOWER than a market historical (reconstructed) cost. (For this very reason, perhaps, no write-DOWN, even to market, is allowed by the LIFO rules.)

LIFO MANIPULATION CAN'T BE CONDONED.

The assumption of the dollar-value LIFO regulation that both the (reconstructed) base-year cost and the current-year cost will reflect actual out-of-pocket costs, i.e., what it actually cost the taxpayer to obtain the goods in an arm's-length transaction, does not appear to envision that a taxpayer selecting the dollar-value LIFO method in its first year of operation may either (1) begin operations with an inventory priced at a non-market (bargain) cost or (2) select a current-year cost measure based on an inflated non-market (non-arm's-length) purchase.

Allowing base-year cost for dollar-value LIFO inventories by a *new corporation first electing LIFO* to be calculated as LaCrosse urges, i.e., based on an actual (but bargain) cost of a corporation's opening inventory that tax year, rather than on the market value of that inventory, **would permit manipula-**

tion. For example, pricing a new item with a market value of \$10,000 at \$1 because of a fortuitous non-arm's-length purchase could set the taxpayer's base-year cost for that item at \$1 in perpetuity. This would shelter \$9,999 of the sales income as Cost of Goods Sold for that item in every succeeding year. **Such a reading of the LIFO regulations leads to a ludicrous, and thus presumably unintended, result.** The Court said that such a result would be similar to that produced by the "base stock" method under which artificially low base prices are used and costs above those amounts are carried into Cost of Goods Sold. These results are not permissible because they obscure the true gain or loss for the year and, thus, misrepresent the facts.

The Court, in its April, 1997 opinion had also stated that a LIFO index that reflects price increases caused by factors other than cost inflation (such as bargain purchases) foils the purpose of LIFO inventory accounting. "The use of overstated inflation rates to value LIFO inventory pools should be reduced to the extent possible." An artificially low base-year cost is preserved in the LIFO index, and thus inflates Cost of Goods Sold ... and reduces taxes ... by the deflated amount, year after year.

The assumption of the dollar-value LIFO regulations, which underlies the use of base-year cost as a component of calculating the LIFO layer value and, thus, the Cost of Goods Sold in inflationary circumstances, **is that current-year cost exceeds base-year cost and that both are based on arm's-length purchases.** "We believe that the potential distortion of income resulting from locking in a bargain purchase as opening inventory ... is particularly great where the selling and acquiring corporations are related and/or the purchase includes a purchase of substantially all the assets ... such that a portion of the purchase price must be allocated to inventory." This is quoted from General Counsel Memorandum 39,470, dated Jan. 6, 1986.

**THE UNEXPECTED WINDFALL:
A TAX-FREE BASIS STEP-UP**

The post-opinion brief filed by the IRS/Government after the *LaCrosse* decision in April of 1997, disputed the Court's conclusion that the opening inventory in the base-year should be valued at fair-market value. However, Judge Weinstein did not find the objections of the IRS persuasive. Interestingly, in the post-opinion briefs, LaCrosse ended up supporting the Court's holding and the IRS ended up objecting to it! In other words, the taxpayer argued in its post-trial brief that the beginning inventory should be valued at (higher) fair-market value and the IRS argued in its post-trial brief that the beginning inven-



LIFO & Bargain Purchase Inventories...

tory should be valued at (lower) actual bargain purchase cost.

Near the end of the April, 1997 *LaCrosse* decision, the Court concludes that the IRS may prohibit *LaCrosse* from using the bargain cost of the bulk purchase items as the base-year cost for those items in the year in which they were acquired." It adds a citation, after which, the following appears: "LIFO Inventory must be taken at cost in the first year to prevent **windfall tax liability reduction**."

In the May, 1998 decision, Judge Weinstein observes that the use of fair-market value instead of bargain cost to determine the base-year cost of the opening bargain inventory has a significant impact on the cost of goods sold and therefore on the income realized by the taxpayer if the taxpayer places the bargain items in a separate item category (as required by Kohler). Placing the bargain items in separate item categories treats the first-in bargain items as those first sold.

The crux and irony of it all comes at paragraphs 44 and 45: "If, as defendant (IRS) proposes, the base-year cost for the bargain items is set at the bargain cost, and item treatment is given, then the taxpayer will realize income upon the entire benefit of the bargain purchase in the first year assuming, as occurred here, that the bargain purchase goods which are deemed sold first, were sold within the first year. This is because the opening inventory in the base-year consists only of the bargain purchase goods valued at their (discounted) bargain cost, whereas the base-year closing inventory contains only the subsequently-purchased (full market price) goods. As a result, the LIFO layer in the base-year consists of the entire difference in cost between the bargain goods and the full-priced goods.

"However, if item treatment is given, as required by *Kohler*, and the base-year cost is set at fair-market value as Reg. Sec. 1.472-(8)(e)(2)(iii) appears to require, then there will be little difference between the dollar-value of the opening inventory (consisting of bargain goods valued at fair-market value) and that of the closing inventory (consisting of full-market-value subsequently-purchased goods). As a result, the LIFO layer will not include any of the difference in cost between the bargain goods and the full-price goods. **In effect, the bargain goods (which again are deemed sold first with item treatment) are provided a stepped-up basis such that the benefit of the bargain purchase is never realized as income or tax.**"

The Court stated that "despite the creation of some anomalous results when, as *Kohler* requires,

(Continued)

bargain goods and subsequently-acquired goods are placed in separate item categories," *LaCrosse* is required to use a market-based cost to measure the base-year cost of the bulk purchase items acquired from Rubber Mills, because it accords with the language and the intent of the regulations (Reg. Sec. 1.472-(a)(e)(2)(iii)) and with generally accepted accounting principles.

OBSERVATIONS

LaCrosse and other bargain purchase taxpayers like it have been handed an astounding result.

Has the Court entirely missed the point in wallowing in its concern over the technicalities of **on, at & after** with reference to the base date or the beginning of the year in this bargain purchase situation? Do we have another classic example of missing the big picture ... rearranging the deck chairs on the sinking *Titanic*?

All the Court's technical interpretations ... and the "presumptions" it imputed to the dollar-value regulations in reaching its conclusions are clearly set forth for further consideration. Perhaps when the Treasury realizes the consequences of the Court's conclusion, it may bring the case forward to the Court of Appeals to try to get a different result.

In the meantime, based on *LaCrosse*, it would appear that taxpayers who have liquidated their LIFO layers and sold off their inventories **in years that are still open under the statute of limitations** may be entitled to refunds.

Under the *LaCrosse* rationale, the taxpayer adopting LIFO in a first year bargain purchase situation would recognize no bargain-purchase income if unchallenged by the IRS. Similarly, if the use of LIFO in the first year were challenged by the IRS and the *LaCrosse* rationale were applied, that taxpayer would have the same result in the first year: No income as a result of the bargain purchase because of the "wash effect" of offsetting the beginning inventory at fair-market value against a corresponding amount of the ending inventory at its fair-market/current cost.

The real difference is found in a five-letter word: **BASIS**.

Under the combination of a LIFO election with a bargain purchase inventory situation, the benefit of the bargain purchase is preserved in the lower base layer of the inventory ... but it is eventually subject to tax when that layer is eventually invaded or liquidated. However, it appears that under the *LaCrosse* rationale, there is a complete step-up in basis for the opening inventory so that the bargain purchase element in that opening inventory is never taxed.

see **LIFO & BARGAIN PURCHASE INVENTORIES**, page 10



Talk about a windfall! Our reaction can best be expressed by quoting Judge Weinstein's own words and example in her April, 1997 decision: "Such a reading of the LIFO regulations leads to a ludicrous, and thus presumably unintended, result." Her example cited concern over sheltering or deferring the bargain purchase element from income tax by future inventory level manipulation ... in perpetuity. What the result in *LaCrosse* gives taxpayers is even better: a tax-free step up in basis ... immediately ... so there's no need to worry about inventory levels or future liquidations at all.

REFUNDS FOR EVERYONE?

WHERE DO WE GO FROM HERE?

Will the *LaCrosse* result have broad application to bargain purchase/LIFO situations? Will the specific facts in *LaCrosse* serve to differentiate it from other cases or situations where the related party aspects of Section 482 might not be applied?

Some of the facts in *LaCrosse* may present limitations to expanding the holding in this case to other LIFO/bargain purchase scenarios:

1. The bargain purchase transaction was not undertaken by parties negotiating at arm's-length. *LaCrosse* was formed by certain members of the management and ownership group of Rubber Mills (the entity whose assets were purchased). There were extensive overlaps and numerous familial relationships between the directors, officers and owners of the two groups. The Court said that there is an assumption in the dollar-value LIFO regulations that costs used for inflation measurement purposes are based on arm's-length purchases and it recognized that under Section 482 the IRS could reallocate payments between two corporations "owned or controlled directly or indirectly by the same interests" to clearly reflect income. It stated that "given this authority in the Commissioner, the court need not reach the question of whether the sale was a sham transaction."

2. The valuation which supported the acquisition price was based solely on Rubber Mills' liquidation value. Replacement cost, sales comparison and/or income analysis methods were not considered. The Court said "... absent all three methods, the appraisal may be viewed as highly questionable." Here the Court cited an IRS training manual and observed that the company had been on the market for less than a year at the time when the valuation report had been issued. Although referred to in the stipulation of facts as an asset purchase, in fact *LaCrosse's* purchase of Rubber Mills was as a going concern.

3. The Court stated that the only business justification given for the sale "appears weak." The "philosophical conflicts" maybe weren't so great, and the Court opined that a "simple buy-out" of one individual's interests might have done the job. The evidence presented was not sufficient to dispel the conclusion that the true purposes driving the sale were (1) to increase business in the more profitable purchased imported goods, (2) to obtain a tax benefit for Rubber Mills from the sale at a loss and, more importantly, (3) to write down the older inventory.

4. The buyer and the seller did not bargain over the "allocation agreement" which allocated \$1.9 million to an inventory that had a market value of roughly \$5.8 million and a (pre-sale) book value of \$4.1 million. The cost to *LaCrosse* of Rubber Mills' inventory was only 33% of, or 67% less than, its market value ... and only 47% of, or 53% less than, its book value to the seller.

5. The taxpayer was a new (i.e., newly formed) entity. As such, it had no prior existence. The Court weighed heavily on this fact in disallowing the use of the "earliest acquisitions" method by a "new" taxpayer to determine current year cost for valuing a LIFO increment in its first year. The Court said: "... When *no method of accounting has been regularly used*, as here, with a new corporation first electing a method of accounting, the computation or method 'shall be made under such method as, in the opinion of the Secretary, does clearly reflect income.' **Thus, the Secretary's discretion is even broader in the case of a new taxpayer**, and the issue raised by some courts, that the Secretary before imposing a new method must first consider whether the taxpayer's current selected method clearly reflects income, does not arise."

FINAL THOUGHTS

In summary, the result in *LaCrosse* hands taxpayers an even better, tax-free result without any need to be concerned over future inventory levels. Taxpayers never even dared to expect a tax-free, step-up in basis for bargain purchase inventories.

It's just too good to be true ... and when something seems too good to be true, it usually isn't ... or it usually isn't around for very long. *LaCrosse* seems to have the makings of another *Albertsons*.

Expect to hear more about *LaCrosse*—the case, not the sport—in the future.

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NEW ITEM REPORT FOR 1997 CALENDAR YEAR DEALERS

1997-1998 MODELS IN DECEMBER, 1997 INVENTORIES

We are pleased to present our 1998 New Item Report which compares side-by-side our "unofficial" determinations of new items and those made by the Acting IRS Motor Vehicle Industry Specialist (Grand Rapids, MI). The IRS list dated May 7, 1998 was transmitted by the Acting Specialist with the following disclaimer: "This list is similar to the guidance I provide to examiners who audit automobile dealers' tax returns and is the result of research by my staff of the best information available to us. Since the list is not an 'Official List,' it does not reflect 'Service Position' and examiners are not required to follow it."

The interpretations and determinations reflected in the IRS' "unofficial list" are not made by the same individuals who drafted and released Revenue Procedure 97-36 (formerly 92-79)—nor is this "unofficial list" released by the same IRS (National) Office.

HOW TO INTERPRET OUR REPORT

The detailed new item listings require 13 pages, starting with new automobiles (pages 1 through 8) followed by new light-duty trucks...including sport utility vehicles, minivans and off-roads...bringing up the rear (pages 9 through 13). These tables show complete make, model, body style and model code information.

Each page shows "our" **LIFO Lookout SUPERLIFO™** new items list on the left-hand side. The right-hand side (including the "Yes" column) shows the IRS' Motor Vehicle Industry new item listing. To make it easier to concentrate on the differences, where a new item on our list also appears on the IRS' list, that detailed item category has not been recopied onto the right-hand side. Item categories listed on the right-hand side/"IRS" half of the page" are only those item categories which the IRS determined to be "new" but which do not appear on our list because we did not think they should be treated as new items.

The "Yes/No" columns should be read as follows: If an "X" appears in the "Yes" column, that item category has been determined by the Internal Revenue Service to be a new item category. Thus, every item category listed on the left-hand side of the page with a corresponding "X" in the "Yes" column shows those item categories where we are in agreement with the IRS. Where there are blank spaces on the left-hand side of the page, but item category entries on the corresponding right-hand side of the page, you can clearly see those item categories which the IRS

concluded were new items, but which we did not. We have included "comment code" and "comments" columns. The legend on the cover page of our New Item Report explains the abbreviations in the "comment code" column. In some instances, varying introduction dates created differences in our respective determinations.

If an "X" appears in the "No" column, that item category is listed on the left-hand (our) side and that is an item category that we treated as "new", but which the IRS did not. For example, the Audi A6 Series 4-dr Wagon Auto (4A53U8) was an item that we determined to be a new item category, but the IRS did not. In some instances, we understand why we disagree (i.e., see the "comments" column) and in other situations, we're not quite sure why we don't agree.

We carefully reviewed our new item determinations and compared them with the IRS lists. The IRS lists continue to be more useful because the Service continued to use a calendar year cut-off, rather than a model year cut-off, in its compilation of the lists. In other words, the Service continued to reflect and review product information more consistent with a December 31 year-end taxpayer and this, in turn, eliminated from a listing of differences many items that would otherwise have been "timing differences."

IN SUMMARY: Everything listed on the left-hand (our) side with an "X" in the "Yes" column is an item category where we agreed with the IRS that it was a new item. Everything with an "X" in the "Yes" column is on the IRS' new item list. Everything on the right-hand (IRS) side of the page is an item category that the IRS considered to be new...and we did not. Finally, everything with an "X" in the "No" column was something that we thought should be a new item, but the IRS did not agree.

On an overall basis, with respect to December 31, 1997 year-end, we identified 352 new item categories (200 autos and 152 light-duty trucks) whereas the IRS identified 493 new item categories (291 autos and 202 light-duty trucks). For reference purposes, in connection with last year's analysis of December 31, 1996 inventories, we identified 365 new item categories (205 autos and 160 light-duty trucks) and the IRS identified 471 new item categories (227 autos and 244 light-duty trucks).

see **NEW ITEM REPORT FOR 1997 CALENDAR YEAR DEALERS**, page 12



NEW ITEM: SO WHAT?

New item categories are required to be included in the annual computation of inflation (or deflation) at a 1.000 factor. This is accomplished by using the same dollar amount to represent the end-of-the-year base cost and the beginning-of-the-year base cost. Since any number divided by itself equals 1.000, a new item contributes no inflation (or deflation) to the annual index.

However, the inclusion of the same dollar amount in both the numerator and in the denominator of the same fraction will reduce the overall weighted index result (i.e., it depresses the index computed) if there is overall inflation for the year. Alternatively, this new item treatment will increase the overall result (i.e., it increases the index computed) if there is overall deflation for the year.

The differences in LIFO inflation indexes and LIFO reserves could be significant depending on how these vehicles are treated in the dealer's LIFO computations. Last year, major differences occurred in new item determinations for the following vehicles: Oldsmobile, Plymouth Breeze, Ford F-150 pickups, Subaru and Chevy and GMC full-size cargo and passenger vans.

This year, **SUBARU** (Impreza and Legacy) accounted for major differences, along with **FORD** Contour, Escort and Taurus, **MERCURY** Mystique and Sable, **VOLKSWAGEN** Cabrio, Golf, GTI and Jetta, and the **VOLVO** 70 and 90 Series. The following discussions highlight some of the differences and the degree of precision called for in new item determinations. →

NEW ITEM CATEGORY

- Any new or reassigned manufacturer's model code that was caused by a change in an existing vehicle,
- A manufacturer's model code created or reassigned because the classified vehicle did not previously exist, or
- If there is no change in a manufacturer's model code, but there has been a change to the platform (i.e., the piece of metal at the bottom of the chassis that determines the length and width of the vehicle and the structural set-up of the vehicle) that results in a change in track width or wheel base, whether or not the same model name was previously used by the manufacturer, a new item category is created.

REVENUE PROCEDURE 97-36; SECTION 4.02(5)

REASONS FOR DIFFERENCES IN NEW ITEM LISTS

- Often, where a name change or a code number change occurred, a comparison of the content of the '97 and the '98 models showed no content change in the vehicle. In these cases, we treated the vehicles as continuing items and resisted the temptation to call them new items ... even though the IRS did not.
- Variations in item category breakdown, including situations involving special editions, such as California, Washington, Oregon and Idaho, Massachusetts and New York special values and General Motors' Consumer Marketing Initiative (CMI).
- Another major difference in interpretation causing differences in our lists relates to engine changes: The IRS treated any engine change as automatically resulting in a new item whereas we did not,
- Minor variations in item category breakdowns (i.e., method of listing automatic and 5-speed item categories with the same base price or the extent of recording regionally specific market or value-priced editions), and
- Differences in information available at release dates: In some cases, the IRS did not include 1997 models introduced after January 1, 1997, whereas on our list, we included these 1997 models, where appropriate, as new items,



New Item Report for 1997 Calendar Year Dealers

FORD & MERCURY: Generally, the Ford Contour, Escort and Taurus 1998 models were described on their price lists as part of a "Ford Choice" marketing approach intended to simplify their overall sedan and wagon offerings. Mercury had a similar program for its Mystique and Sable 1998 models. For 1998 models, Ford and Mercury introduced two distinct series: the LX which became the designation for the entry level (less expensive) series models and the SE which became the designation for the high volume (comparatively more expensive) series models.

As can be seen from the appropriate "yes" column entries, we determined that where there was no change in the vehicle content from year to year, we did not treat the 1998 vehicle as a new item, ... whereas the IRS did treat these vehicles as new items in most—but not all—cases. We believe our approach follows more closely the statement again included in Section 4.02 that "generally, the manufacturer's base model codes used in defining items and identifying items under the Alternative LIFO Method have an average life of approximately five to seven years."

SUBARU: STILL UP TO ITS OLD TRICKS (AND THE IRS, TOO, FOR THAT MATTER)! Again this year, Subaru changed many of the model codes (note: last year it had changed all the model codes) for its Impreza and Legacy vehicles. However, on many of these vehicles—but not on all—Subaru made no changes to the vehicle nor to the contents of their option packages.

In our analysis to determine whether a specific item category was new or continuing, we ignored the change in the model code and made a direct comparison of the vehicle/item category with its beginning-of-the-year counterpart to determine whether there was any change to the vehicle. Where our analysis indicated that no change to the vehicle had occurred, our conclusion was that that vehicle was a continuing item (not a new item) based upon Section 4.02(5) of Rev. Proc. 97-36 which requires new item category treatment only for "any new or reassigned

(Continued)

manufacturer's model code that was caused by a change in an existing vehicle." Having found no "change in an existing vehicle," our conclusion was that the change in model code was irrelevant and did not per se result in new item classification.

If our careful analysis comparing end-of-the-year and beginning-of-the-year vehicles disclosed a change in the vehicle content, then that changed vehicle was classified as a new item in accordance with the above definition.

Accordingly, some Imprezas and some Legacys are new items, while others are continuing items. A glance at our new item list will show you which is/are which.

At least this year, the IRS did not categorically treat all Imprezas and Legacys as new items.

VOLKSWAGEN: For the Cabrio, Golf, GTI and Jetta models, this year Volkswagen changed the 2nd and/or the 4th digit of their respective model codes. However, all of these models are carryover models from 1997, and Volkswagen has scheduled these models to be redesigned for the 1999 model year. In comparing the model content from year to year, where we found no changes, we accordingly treated these vehicles as continuing items, notwithstanding the change in the 2nd and/or 4th digit of the model code.

VOLVO: For 1998, the 850 Series was rebadged as the 70 Series and the 900 Series was rebadged as the 90 Series with a C designation for coupe models, a S designation for sedan models and a V designation for wagon models. In comparing the model content from year to year, where we found no changes, we accordingly treated vehicles with no content changes as continuing items, despite the rebadging designations.

.....

If you'd like a complete copy of the IRS December, 1997 new item list, please give us a call or call the IRS at (616) 235-1725 to request a copy. *

MAJOR NEW ITEM DIFFERENCES

DECEMBER 31, 1996

- Oldsmobiles
- Plymouth Breezes
- Ford F150 Pickups
- Subarus
- Chevrolet Full-Size Vans
- GMC Full-Size Vans

DECEMBER 31, 1997

- Ford Contour, Escort & Taurus
- Mercury Mystique & Sable
- Subaru Impreza & Legacy
- Volkswagen Cabrio, Golf, GTI & Jetta
- Volvo 70 & 90 Series



DE FILIPPS'**LIFO
LOOKOUT****1998****NEW ITEM
REPORT**

COMPARISON OF "UNOFFICIAL" NEW ITEM CATEGORY LISTS
LIFO LOOKOUT / SUPERLIFO™ AND INTERNAL REVENUE SERVICE / MOTOR VEHICLE INDUSTRY SPECIALIST

NEW AUTOMOBILES AND LIGHT-DUTY TRUCKS
 INVOLVING MANUFACTURER MODEL YEARS 1997-1998

LIFO LOOKOUT / SUPERLIFO™ - NEW ITEMS LIST
 FOR CALENDAR YEAR 1997 DEALERS

&

IRS MOTOR VEHICLE INDUSTRY SPECIALIST
 (DECEMBER, 1997 CALENDAR YEAR)

LEGEND / COMMENT CODE

E = DIFFERENCE IN ENGINE / MOST DETAILED DESCRIPTION
 OP = OPTION PACKAGES / MOST DETAILED DESCRIPTION

 CMI = CONSUMER MARKETING INITIATIVE (GENERAL MOTORS)
 CNYM = CALIFORNIA, NEW YORK, MASSACHUSETTS
 CWOI = CALIFORNIA, WASHINGTON, OREGON, IDAHO
 SV - C = SPECIAL VALUE CALIFORNIA

 TIMING = TIMING DIFFERENCE: IRS RECEIVED INFORMATION LATER

 DIFSC = DIFFERENT INFORMATION SOURCES AVAILABLE TO
 IRS AND / OR TO **SUPERLIFO™**

NUMBER OF NEW ITEMS

	LIFO LOOKOUT / SUPERLIFO™ NEW ITEM CATEGORY	IRS NEW ITEM CATEGORY
AUTOMOBILES	200	291
LIGHT-DUTY TRUCKS	152	202
TOTAL NEW ITEM CATEGORIES	352	493

COMPARISON OF "UNOFFICIAL" NEW ITEM CATEGORY LISTS
LIFO LOOKOUT / SUPERLIFO™ AND INTERNAL REVENUE SERVICE / MOTOR VEHICLE INDUSTRY SPECIALIST

NEW AUTOMOBILES AND NEW LIGHT-DUTY TRUCKS
FOR CALENDAR YEAR DEALERS - DECEMBER 31, 1997

SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 1997 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 1997 CALENDAR YEAR)			PAGE 1 OF 13		
MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
NEW AUTOMOBILES						NEW AUTOMOBILES			
ACURA	INTEGRA TYPE-R		DC231V	X		3-DR SPORT COUPE 1.8 5-SP	T	97 MODEL 7-16-97 INTRO	
			YA314WJW	X		2-DR COUPE 2.3 5-SP	E	3rd DIGIT CHANGED TO 3	
	CL		YA315WJW	X		2-DR COUPE 2.3 5-SP W/PREM PKG	E	3rd DIGIT CHANGED TO 3	
			YA324WJW	X		2-DR COUPE 2.3 AUTO	E	3rd DIGIT CHANGED TO 3	
		YA325WJW	X		2-DR COUPE 2.3 AUTO W/PREM PKG	E	3rd DIGIT CHANGED TO 3		
		YA224WJW	X		2-DR COUPE 3.0 AUTO	E			
		YA225WJW	X		2-DR COUPE 3.0 AUTO W/PREM PKG	E			
	NSX	2-DR COUPE 5-SP	NA213	X					
		2-DR COUPE AUTO	NA123	X					
	NSX-T	2-DR COUPE 5-SP	NA216	X					
		2-DR COUPE AUTO	NA126	X					
	RL	4-DR SEDAN W/NAV PKG	KA967	X					
			KA964WJW	X		4-DR SEDAN AUTO	OP		
			KA965WJT	X		4-DR SEDAN 3.5 AUTO W/PREM PKG	OP		
			KA966WJT	X		4-DR SEDAN 3.5 AUTO W/NAV PKG CA	OP		
	TL		UA265WJW	X		4-DR SEDAN 2.5 AUTO	OP		
		UA364WJW	X		4-DR SEDAN 3.2 AUTO	OP			
AUDI		A4 SERIES	4-DR WAGON AVANT 5-SP	8D55VK	X				
			4-DR WAGON AVANT QUATTRO 5-SP	8D55V5	X				
	4-DR WAGON AVANT QUATTRO AUTO		8D55VZ	X					
			8D25V4	X		4-DR SEDAN 2.8 5-SP		LAST 2 DIGITS CHANGED	
		8D25VK	X		4-DR SEDAN 2.8 AUTO		LAST 2 DIGITS CHANGED		
		8D25V5	X		4-DR SEDAN 2.8 5-SP QUATTRO AWD		LAST 2 DIGITS CHANGED		
		8D25VZ	X		4-DR SEDAN 2.8 AUTO QUATTRO AWD		LAST 2 DIGITS CHANGED		
		8D25I4	X		4-DR SEDAN 1.8 5-SP				
A6 SERIES	4-DR SEDAN AUTO	8D25I5	X		4-DR SEDAN 1.8 5-SP QUATTRO AWD	TIMING			
		4B24VA	X			TIMING			
A8 SERIES	4-DR SEDAN QUATTRO AUTO	4B24VB	X						
	4-DR WAGON AUTO	4A53U8		X		DIFSC			
		AD22UA	X		4-DR SEDAN 3.7L	DIFSC			
		AD228B	X		4-DR SEDAN 4.2L QUATTRO	DIFSC			
BMW	3 SERIES	323IC 2-DR CONVERTIBLE 5-SP	41	X					
		323ICA 2-DR CONVERTIBLE AUTO	46	X					
		323IS 2-DR COUPE 5-SP	34	X					
		323ISA 2-DR COUPE AUTO	39	X					
BUICK	CENTURY	4-DR SEDAN CUSTOM 1SG CWOI	S69 1SG	X					
		4-DR SEDAN LIMITED 1SH CWOI	Y69 1SH	X					
			S69	X		4-DR SEDAN CUSTOM 3.1L	TIMING	97 MODEL 12-1-96 INTRO	
			Y69	X		4-DR SEDAN LIMITED 3.1L	TIMING	97 MODEL 12-1-96 INTRO	





SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 1997 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 1997 CALENDAR YEAR)			PAGE 2 OF 13	
MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
BUICK	LESABRE	4-DR SEDAN CUSTOM 1SG CWOI	P69 1SG		X		CWOI	
		4-DR SEDAN LIMITED 1SG CWOI	R69 1SG		X		CWOI	
	PARK AVENUE	4-DR SEDAN 1SG CWOI	W69 1SG		X		CWOI	
		4-DR SEDAN 1SH CWOI	W69 1SH		X		CWOI	
	REGAL	4-DR SEDAN GS	F69	X				
		4-DR SEDAN GS 1SH CWOI	F69 1SH	X				
		4-DR SEDAN LS	B69	X				
		4-DR SEDAN LS 1SG CWOI	B69 1SG	X				
	RIVIERA		B69	X		4-DR SEDAN 3.8L LS 25TH ANNIVERSARY	DIFSC	
		2-DR COUPE 1SG CWOI	D07 1SG		X		CWOI	
CADILLAC	DEVILLE		6KD69	X		4-DR SEDAN 4.6L CA	CMI	
			6KD69	X		4-DR SEDAN 4.6L EXCLUDING CA	CMI	
	ELDORADO		6EL57	X		2-DR COUPE 4.6L CA	CMI	
			6EL57	X		2-DR COUPE 4.6L EXCLUDING CA	CMI	
	SEVILLE	4-DR SEDAN SLS	6KS69		X		TIMING	
		4-DR SEDAN STS	6KY69		X		TIMING	
CHEVROLET/GEO	CAMARO	2-DR COUPE CWOI	1FP87 CWOI	X				
		2-DR CONVERTIBLE Z24	1JF67	X				
	CAVALIER	2-DR COUPE R8L CWOI	1JC37 R8L		X		CWOI	
		4-DR SEDAN R8L CWOI	1JC69 R8L		X		CWOI	
	CORVETTE	2-DR CONVERTIBLE COUPE	1YY67	X				
		2-DR COUPE	1YY07	X				
	LUMINA	4-DR SEDAN LTZ R8L CWOI	1WN69 R8L	X				
			1WN69 Z7E	X		4-DR SEDAN LTZ 3.1L	TIMING	97 MODEL 12-1-96 INTRO
	MALIBU	4-DR SEDAN LS CWOI	1NE69 CWOI		X		CWOI	
		3-DR H/B COUPE CWOI	1MR08 CWOI	X				
	METRO		1MR69 CWOI	X				
			1WX27 CWOI	X				
	MONTE CARLO	2-DR COUPE Z34 R8L CWOI	1WX27	X		2-DR COUPE Z34	E	
			1SK19	X				
			1SK19 CWOI	X				
		1SK19 LSI	X					
CHRYSLER	CIRRUS	4-DR SEDAN LXI	JACP41		X		TIMING	
		4-DR SEDAN LX	LHCH41		X		TIMING	
DODGE	INTREPID	4-DR SEDAN	LHDH41	X				
		4-DR SEDAN ES	LHDP41	X				
	VIPER	2 SEAT RT/10 ROADSTER	SRD27		X		TIMING	
FORD	CONTOUR	4-DR SEDAN SVT	P68	X				
			P65	X		4-DR SEDAN LX		MODEL CODE CHANGE
			P66	X		4-DR SEDAN SE		MODEL CODE CHANGE
	CROWN VICTORIA	4-DR SEDAN	P73	X				
		4-DR SEDAN-FLEET	P72		X		DIFSC	
		4-DR SEDAN LX	P74	X				
		4-DR SEDAN POLICE INTERCEPTOR	P71		X		DIFSC	



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
FORD	ESCORT	2-DR COOL COUPE ZX2	P11 CC	X				DIFSC DIFSC	
		2-DR HOT COUPE ZX2	P11 HC	X					
	TAURUS		P53	X		4-DR SEDAN SE COMFORT			
			P58	X		4-DR WAGON SE COMFORT			
HONDA	ACCORD	2-DR COUPE EX 3.0 AUTO	CG225	X				DIFSC DIFSC	
		2-DR COUPE EX 5-SP	CG315	X					
		2-DR COUPE EX 5-SP W/LEATHER	CG315L	X					
		2-DR COUPE EX AUTO	CG325	X					
		2-DR COUPE EX AUTO W/LEATHER	CG325L	X					
		2-DR COUPE LX 3.0 AUTO	CG224	X					
		2-DR COUPE LX 5-SP	CG314	X					
		2-DR COUPE LX AUTO	CG324	X					
		2-DR COUPE ULEV EX AUTO	CG327		X				
		2-DR COUPE ULEV EX AUTO W/LEATH	CG327L		X				
		4-DR SEDAN 3.0 LX AUTO	CG164	X					
		4-DR SEDAN DX 5-SP	CF854	X					
		4-DR SEDAN DX AUTO	CF864	X					
		4-DR SEDAN EX 5-SP	CG555	X					
		4-DR SEDAN EX 5-SP W/LEATHER	CG555L	X					
		4-DR SEDAN EX AUTO	CG565	X					
		4-DR SEDAN EX AUTO W/LEATHER	CG165L	X					
		4-DR SEDAN EX AUTO W/LEATHER	CG565L	X					
		4-DR SEDAN LX 5-SP	CG554	X					
		4-DR SEDAN LX AUTO	CG564	X					
		4-DR SEDAN LX AUTO W/ABS	CG564 ABS	X					
		4-DR SEDAN ULEV EX AUTO	CG667		X				
		4-DR SEDAN ULEV AUTO W/LEATHER	CG667L		X				
			CD720V	X		2-DR COUPE 2.2L SPECIAL EDITION AUTO			
			CD560V	X		4-DR SEDAN 2.2L SPECIAL EDITION AUTO			
HYUNDAI	ACCENT	3-DR HATCHBACK GSI 5-SP	12343	X					
		3-DR HATCHBACK GSI AUTO	12342	X					
INFINITI	Q45	4-DR SEDAN	9431	X					
		4-DR SEDAN TOURING	9481	X					
JAGUAR	XJ8	4-DR SEDAN	XJ8	X					
		4-DR SEDAN L	XJ8L	X					
		4-DR SEDAN VANDEN PLAS	XJVDP	X					
		4-DR SEDAN XJR	XJR	X					
KIA	SEPHIA	4-DR SEDAN LS AUTO W/PWR PKG	14242		X			TIMING TIMING TIMING TIMING TIMING TIMING	
		4-DR SEDAN AUTO	14202		X				
		4-DR SEDAN LS 5-SP	14221		X				
		4-DR SEDAN LS 5-SP W/PWR PKG	14241		X				
		4-DR SEDAN LS AUTO	14222		X				
		4-DR SEDAN RS 5-SP	14201		X				
LEXUS	GS 300 SEDAN	4-DR LUXURY SPORT AUTO	9300	X					
		4-DR LUXURY SPORT AUTO CA/NY	9310	X					



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
LEXUS	GS 400 SEDAN	4-DR LUXURY SPORT AUTO	9320	X					
		4-DR LUXURY SPORT AUTO CA/NY	9330	X					
LINCOLN	CONTINENTAL TOWN CAR	4-DR CARTIER	M97	X		4-DR SEDAN 4.6L	DIFSC		
		4-DR CARTIER CMNYC	M83	X					
		4-DR EXECUTIVE	M83 CMNYC		X		CMNYC		
		4-DR EXECUTIVE CMNYC	M81	X					
		4-DR EXECUTIVE CMNYC	M81 CMNYC		X		CMNYC		
		4-DR SIGNATURE	M82	X					
		4-DR SIGNATURE CMNYC	M82CMNYC		X		CMNYC		
MAZDA	626	4-DR SEDAN DX 5-SP	626DX	X					
			626DXA	X		4-DR SEDAN DX AUTO	OP		
		4-DR SEDAN ES AUTO	626ES AUTO	X					
		4-DR SEDAN ES V6 5-SP	626ES	X					
		4-DR SEDAN LX 5-SP	626LX	X					
			626LXA	X		4-DR SEDAN LX AUTO	OP		
		4-DR SEDAN LX V6 5-SP	626LX V6	X					
			626LX6A	X		4-DR SEDAN LX V6 AUTO	OP		
	MIATA	2-DR CONVERTIBLE STO-ED	NA35 STO	X					
			MIATA	X		2-DR CONVERTIBLE STO-ED AUTO	OP		
MERCEDES-BENZ	C280		C280	X		4-DR SEDAN V6	E		
	CLK	CLK320 2-DR COUPE AUTO	CLK320	X					
	E CLASS		E300TD	X		E300TD 4-DR SEDAN TURBO 3.0L	DIFSC		
		E320 4-DR SEDAN AUTO AWD	E320W A	X					
		E320 STATION WAGON AUTO	E320S	X					
		E320 STATION WAGON AUTO AWD	E320S A	X					
	SLK	SLK230 2-DR COUPE/ROADSTER AUTO	SLK230	X					
MERCURY	GRAND MARQUIS	4-DR SEDAN GS	M74		X		DIFSC		
		4-DR SEDAN LS	M75		X		DIFSC		
			M74	X		4-DR SEDAN GS CA/HI	CA/HI		
			M75	X		4-DR SEDAN LS CA/HI	CA/HI		
	SABLE	4-DR SEDAN LS CA	M53 CA	X					
		4-DR WAGON LS CA	M58 CA	X					
			M50	X		4-DR SEDAN LS		MODEL CODE CHANGE	
MITSUBISHI	DIAMANTE	4-DR SEDAN ES AUTO	DM42-B	X					
	GALANT	4-DR SEDAN ES 5-SP	GA41-G 5-SP	X					
NISSAN	240SX	2-DR COUPE LE 5-SP	2635	X				97 MODEL 2-3-97 INTRO	
		2-DR COUPE LE AUTO	2631	X				97 MODEL 2-3-97 INTRO	
	ALTIMA	4-DR SEDAN GLE AUTO	0581	X					
		4-DR SEDAN GXE 5-SP	0575	X					
		4-DR SEDAN GXE AUTO	0571	X					
		4-DR SEDAN SE 5-SP	0595	X					
		4-DR SEDAN SE AUTO	0591	X					
		4-DR SEDAN XE 5-SP	0565	X					
		4-DR SEDAN XE AUTO	0561	X					



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
NISSAN	SENTRA	4-DR SEDAN SE 5-SP 4-DR SEDAN SE AUTO	4245 4241	X X					
OLDSMOBILE	ACHIEVA		3NL69 L69NV L37NV L69NV L37NV	X X X X X		4-DR SEDAN SL V6 4-DR SEDAN SL SERIES I (CMI) 2-DR COUPE SC SERIES I (CMI) 4-DR SEDAN SL SERIES II (CMI) 2-DR COUPE SC SERIES II (CMI)	CMI CMI CMI CMI	1st 2 Digits Added For 98 MODEL	
	AURORA		R29GV	X		4-DR SEDAN V8 (CMI)	CMI		
	CUTLASS		B69PV G69PV H47WV H69WV H47WV H69WV H47WV H69WV	X X X X X X X X		4-DR SEDAN V6 (CMI) 4-DR SEDAN GLS V6 (CMI) 2-DR COUPE SUPREME SL SERIES I (CMI) 4-DR SEDAN SUPREME SL SERIES I (CMI) 2-DR COUPE SUPREME SL SERIES II (CMI) 4-DR SEDAN SUPREME SL SERIES II (CMI) 2-DR COUPE SUPREME SL SERIES III (CMI) 4-DR SEDAN SUPREME SL SERIES III (CMI)	CMI CMI CMI CMI CMI CMI CMI CMI		
	EIGHTY-EIGHT		N69HV N69HV	X X		4-DR SEDAN V6 (CMI) 4-DR SEDAN V6 LS (CMI)	CMI CMI		
	INTRIGUE	4-DR SEDAN	3WH69	X					
		4-DR SEDAN GL	3WS69	X					
	LSS		Y69HV	X		4-DR SEDAN V6 (CMI)	CMI		
	REGENCY		C69HV	X		4-DR SEDAN V6 (CMI)	CMI		
PLYMOUTH	NEON	2-DR COUPE COMPETITION 4-DR SEDAN COMPETITION	PLPL22 PLPL42		X X		DIFSC DIFSC		
	PROWLER		PRPS27	X		2-DR ROADSTER V6	TIMING	97 MODEL 5-8-97 INTRO	
PONTIAC	BONNEVILLE	4-DR SEDAN 1SH CWOI 4-DR SEDAN SSE 1SG CWOI	2HX69 1SH 2HZ69 1SG		X X		CWOI CWOI		
			2HZ69	X		4-DR SEDAN SSE V6		1st 2 Digits Added For 98 MODEL	
	FIREBIRD	2-DR CONVERT. TRANS AM 1SG CWOI 2-DR COUPE 1SH CWOI	2FV87 1SG 2FS87 1SH	X X					
			V87W V87W	X X		2-DR COUPE FORMULA V8 2-DR COUPE TRANS AM V8	DIFSC DIFSC		
	GRAND AM	2-DR COUPE GT 1SH CWOI 2-DR COUPE SE 1SH CWOI	2NW37 1SH 2NE37 1SH	X X					
		4-DR SEDAN GT 1SH CWOI	2NW69 1SH	X					
	GRAND PRIX	4-DR SEDAN GT 1SH CWOI 4-DR SEDAN SE 1SH CWOI	2WP69 1SH 2WJ69 1SH	X X					
	SUNFIRE			X		2-DR CONVERTIBLE SE (CMI)	CMI		
PORSCHE	911		993340 993340 993780	X X X		CARRERA S 2-DR COUPE 6-SP CARRERA S 2-DR COUPE TIPTRONIC 2-DR COUPE TURBO S AWD 6-SP		5th DIGIT CHANGED 5th DIGIT CHANGED	
			986310	X					
	BOXTER	2-SEAT CABRIO 5-SP 2-SEAT CABRIO TIPTRONIC	986310 986310 TIP	X X			DIFSC		
ROLLS ROYCE	BENTLEY	TURBO RT LWB TURBO RT MULLINER TURBO RT SWB	BENTLEY BTRTL BENTLEY BTRTM BENTLEY BTRTS		X X X		DIFSC DIFSC DIFSC		



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
ROLLS ROYCE	ROLLS-ROYCE	SILVER SPUR (W/DIVISION) SILVER SPUR PARK WARD	ROLLS RRSSWD ROLLS RRPW		X X		DIFSC DIFSC		
SAAB	900 SERIES	3-DR COUPE S 5-SP	923	X					
			923A	X		3-DR COUPE S AUTO	OP		
			923MSR	X		3-DR COUPE S 5-SP W/SUNROOF	OP		
			923MSR	X		3-DR COUPE S AUTO W/SUNROOF	OP		
		2-DR COUPE SE TALLEDEGA 5-SP	983	X				97 MODEL 2-1-97 INTRO	
			983ASR	X		2-DR COUPE SE TALLEDEGA AUTO	OP		
		5-DR HBK SE TALLEDEGA 5-SP	985	X				97 MODEL 2-1-97 INTRO	
			985ASR	X		5-DR HBK SE TALLEDEGA AUTO	OP		
		2-DR CONVT SE TALLEDEGA 5-SP	982	X				97 MODEL 2-1-97 INTRO	
			982AT	X		2-DR CONVT SE TALLEDEGA AUTO	OP		
SUBARU	IMPENZA	2-DR COUPE 2.5 RS AWD 5-SP	MC	X					
			MD	X					
		2-DR COUPE 2.5 RS AWD AUTO	WMA	X		2-DR COUPE L AWD 5-SP W/BL EQUIP	OP		
			WMB	X		4-DR SEDAN L AWD AUTO W/BL EQUIP	OP		
		4-DR SEDAN GT LTD AWD AUTO	AG	X					
			WBT	X		5-DR WGN OUTBACK AWD 5-SP OW EQP	OP		
			WBU	X		5-DR WGN OUTBACK AWD AUTO OW EQP	OP		
			WBV	X		5-DR WGN OUTBACK AWD 5-SP OL COLD EQP	OP		
			WBW	X		5-DR WGN OUTBACK AWD AUTO OL COLD EQP	OP		
			WBX	X		5-DR WGN OUTBACK LTD AWD 5-SP RL EQP	OP		
			WBY	X		5-DR WGN OUTBACK LTD AWD AUTO RL EQP	OP		
		4-DR WGN OUTBACK LTD AWD W/DUAL MR	BZ	X					
SUZUKI	ESTEEM	4-DR WAGON GL 5-SP	WGN632	X					
		4-DR WAGON GL AUTO	WGN642	X					
		4-DR WAGON GLX 5-SP	WGN63E	X					
		4-DR WAGON GLX AUTO	WGN64E	X					
		4-DR WAGON GLX PLUS AUTO	WGN64F	X					
TOYOTA	COROLLA	4-DR SEDAN CE 5-SP	1721	X					
		4-DR SEDAN CE AUTO	1722	X					
		4-DR SEDAN LE 5-SP	1737	X					
		4-DR SEDAN LE AUTO	1738	X					
		4-DR SEDAN VE 5-SP	1714	X					
		4-DR SEDAN VE AUTO	1715	X					
	PASEO		1583	X		2-DR CONVERTIBLE 5-SP	TIMING		
			1584	X		2-DR CONVERTIBLE AUTO	TIMING		
	TERCEL		1309	X		2-DR SEDAN HAWK LTD EDITION 5-SP	DIFSC		
			1310	X		2-DR SEDAN HAWK LTD EDITION AUTO	DIFSC		
VOLKSWAGEN	BEETLE	2-DR HATCHBACK 5-SP	1C13L4		X		TIMING		
		2-DR HATCHBACK AUTO	1C13L3		X		TIMING		
		2-DR HATCHBACK TDI 5-SP	1C1354		X		TIMING		
		2-DR HATCHBACK TDI AUTO	1C1353		X		TIMING		



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
VOLKSWAGEN	CABRIO	2-DR CONVERTIBLE BASE CNYM 5-SP	1V72Q4	X		2-DR CONVERTIBLE GL 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1V72M4	X					
			1V72Q3	X		2-DR CONVERTIBLE GL AUTO		2nd AND/OR 4th DIGIT CHANGED	
		2-DR CONVERTIBLE BASE CNYM AUTO	1V72M3	X					
			1V73Q4	X		2-DR CONVERTIBLE GLS 5-SP		2nd AND/OR 4th DIGIT CHANGED	
		2-DR CONVERTIBLE GLS CNYM 5-SP	1V73M4	X					
			1V73Q3	X		2-DR CONVERTIBLE GLS AUTO		2nd AND/OR 4th DIGIT CHANGED	
		2-DR CONVERTIBLE GLS CNYM AUTO	1V73M3	X					
			1W13Q4	X		4-DR HATCHBACK GL 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W13M4	X		4-DR HATCHBACK GL 5-SP CNYM		2nd AND/OR 4th DIGIT CHANGED	
	GOLF		1W13Q3	X		4-DR HATCHBACK GL AUTO		2nd AND/OR 4th DIGIT CHANGED	
			1W13M3	X		4-DR HATCHBACK GL AUTO CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W14Q4	X		2-DR HATCHBACK GTI 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W14M4	X		2-DR HATCHBACK GTI 5-SP CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W14Q3	X		2-DR HATCHBACK GTI AUTO		2nd AND/OR 4th DIGIT CHANGED	
			1W14M3	X		2-DR HATCHBACK GTI AUTO CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W1VT4	X		2-DR HATCHBACK GTI VR6 5-SP		2nd AND/OR 4th DIGIT CHANGED	
		4-DR HATCHBACK 5-SP MUSIC ED	1H1UQ4	X					
			1H1UM4	X		4-DR HATCHBACK JAZZ 5-SP CNYM	CNYM		
			1H1UQ3	X		4-DR HATCHBACK JAZZ AUTO	DIFSC		
			1H1UM3	X		4-DR HATCHBACK JAZZ AUTO CNYM	CNYM		
		4-DR HATCHBACK TREK 5-SP	1H1TQ4	X					
			1H1TM4	X		4-DR HATCHBACK TREK 5-SP CNYM	CNYM		
			1H1TQ3	X		4-DR HATCHBACK TREK AUTO	DIFSC		
			1H1TM3	X		4-DR HATCHBACK TREK AUTO CNYM	CNYM		
			1H1VT4	X		2-DR HATCHBACK GTI VR6 DRIVER/S ED 5-SP	DIFSC		
		JETTA		1W23Q4	X		4-DR SEDAN GL 5-SP		2nd AND/OR 4th DIGIT CHANGED
				1W23M4	X		4-DR SEDAN GL 5-SP CNYM		2nd AND/OR 4th DIGIT CHANGED
				1W23Q3	X		4-DR SEDAN GL AUTO		2nd AND/OR 4th DIGIT CHANGED
				1W23M3	X		4-DR SEDAN GL AUTO CNYM		2nd AND/OR 4th DIGIT CHANGED
			1W2334	X		4-DR SEDAN TDI 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W2PQ4	X		4-DR SEDAN GT 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W2PM4	X		4-DR SEDAN GT 5-SP CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W2PQ3	X		4-DR SEDAN GT AUTO		2nd AND/OR 4th DIGIT CHANGED	
			1W2PM3	X		4-DR SEDAN GT AUTO CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W28Q4	X		4-DR SEDAN GLS 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W28M4	X		4-DR SEDAN GLS 5-SP CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W28Q3	X		4-DR SEDAN GLS AUTO		2nd AND/OR 4th DIGIT CHANGED	
			1W28M3	X		4-DR SEDAN GLS AUTO CNYM		2nd AND/OR 4th DIGIT CHANGED	
			1W27T4	X		4-DR SEDAN GLX 5-SP		2nd AND/OR 4th DIGIT CHANGED	
			1W27T3	X		4-DR SEDAN GLX AUTO		2nd AND/OR 4th DIGIT CHANGED	
	4-DR HATCHBACK MUSIC ED 5-SP		1H2UQ4	X					
	4-DR MUSIC ED 5-SP CNYM		1H2UM4	X					
			1H2UQ3	X		4-DR HATCHBACK JAZZ AUTO	DIFSC		
			1H2UM3	X		4-DR HATCHBACK JAZZ AUTO CNYM	CNYM		
			1H2CQ4	X		4-DR SEDAN TREK 5-SP	DIFSC		
			1H2CM4	X		4-DR SEDAN TREK 5-SP CNYM	CNYM		
			1H2CQ3	X		4-DR SEDAN TREK AUTO	DIFSC		
			1H2CM3	X		4-DR SEDAN TREK AUTO CNYM	CNYM		
			1H2334	X		4-DR SEDAN TDI 5-SP			
			1H2333	X		4-DR SEDAN TDI AUTO			



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
VOLKSWAGEN	JETTA	4-DR SEDAN K2 5-SP	1W2LQ4		X		TIMING		
		4-DR SEDAN K2 AUTO	1W2LQ3		X		TIMING		
		4-DR SEDAN K2 5-SP CNYM	1W2LM4		X		CNYM		
		4-DR SEDAN K2 AUTO CNYM	1W2LM3		X		CNYM		
	PASSAT	4-DR SEDAN GLS 5-SP	3B24K5	X					
		4-DR SEDAN GLS AUTO	3B24K9	X					
		4-DR SEDAN GLS TDI 5-SP	3B2445	X					
		4-DR SEDAN GLS TDI AUTO	3B2448	X					
		4-DR SEDAN GLS V6 5-SP	3B24S5		X		TIMING		
		4-DR SEDAN GLS V6 AUTO	3B24S9		X		TIMING		
		4-DR SEDAN GLX 5-SP	3B24S5		X		TIMING		
		4-DR SEDAN GLX AUTO	3B24S9		X		TIMING		
	VOLVO	70 SERIES	C70 2-DR COUPE 5-SP		X		DIFSC		
			C70 2-DR COUPE AUTO		X		DIFSC		
			S70M	X		S70 4-DR SEDAN 5-SP		REPLACES 850 SERIES	
			S70A	X		S70 4-DR SEDAN AUTO		REPLACES 850 SERIES	
			S70 GTMS	X		S70 GT 4-DR SEDAN 5-SP		REPLACES 850 SERIES	
			S70 GTAS	X		S70 GT 4-DR SEDAN AUTO		REPLACES 850 SERIES	
			S70 GLT	X		S70 GLT 4-DR SEDAN AUTO		REPLACES 850 SERIES	
			S70 4-DR SEDAN T5 5-SP	X					
			S70T5M	X					
			S70T5A	X		S70 4-DR SEDAN T5 AUTO	OP		
			V70 5-DR WGN AWD AUTO	X					
			V70 5-DR WGN AWD C C AUTO		X		OP		
			V70 5-DR WGN AWD C C W/SR AUTO	X					
			V70 5-DR WGN AWD TURBO W/SR	X					
			V70 5-DR WAGON AWD W/SR AUTO	X					
			V70M	X		V70 5-DR WAGON 5-SP		REPLACES 850 SERIES	
			V70A	X		V70 5-DR WAGON AUTO		REPLACES 850 SERIES	
			V70 GTMS	X		V70 GT 5-DR WAGON 5-SP		REPLACES 850 SERIES	
			V70 GTAS	X		V70 GT 5-DR WAGON AUTO		REPLACES 850 SERIES	
			V70 GLT	X		V70 GLT 5-DR WAGON AUTO		REPLACES 850 SERIES	
			V70T5M	X					
			V70 T5A	X		V70 T5 5-DR WAGON AUTO	OP		

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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
<u>NEW LIGHT-DUTY TRUCKS</u>						<u>NEW LIGHT-DUTY TRUCKS</u>		
ACURA	SLX	4-DR AUTO 3.5 4WD	9C427	X				
CHEVROLET/GEO	ASTRO		L11006	X		EXT PASSENGER VAN AWD 111" WB CMI	CMI	
	BLAZER	4-DR LS PLUS W1SX CWOI	CS10506 1SX	X				
		4-DR LS W1SW CWOI	CS10506 1SW	X				
		4-DR LS W1SX CWOI	CT10506 1SX	X				
		4-DR LT W1SW CWOI	CT10506 1SW	X				
		4-DR LT W1SY CWOI	CS10506 1SY	X				
		4-DR LT W1SY CWOI	CT10506 1SY	X				
	C-K PICKUP	2WD C1500 F/S EXT CWOI	CC10753 CWOI	X				
		2WD C1500 S/S XCAB SWB SILVERADO	CC10753 SSS	X				
		2WD F/S EXT CWOI	CC10953 CWOI	X				
		4WD K1500 S/S XCAB SWB SILVERADO	CK10753 SSS	X				
	EXPRESS		CG11406	X		1500 PASSENGER VAN	DIFSC	
			CG21406	X		2500 PASSENGER VAN 135" WB	DIFSC	
			CG21706	X		2500 EXT PASSENGER VAN 155" WB	DIFSC	
			CG31406	X		3500 PASSENGER VAN 135" WB	DIFSC	
			CG31706	X		3500 EXT PASSENGER VAN 155" WB	DIFSC	
		2WD F/S EXT CAB LS 1ST CWOI	CS10653 FL1ST		X		CWOI	
		2WD F/S EXT CAB LS 1SW CWOI	CS10653 1SW		X		CWOI	
		2WD S/S EXT CAB LS 1ST CWOI	CS10653 1ST		X		CWOI	
		2WD S/S REG CAB LS 1ST CWOI	CS10603 1ST	X				
			CS10653	X		2WD S/S EXT CAB CMI	CMI	
			CS10653	X		2WD S/S EXT CAB V6 CMI	CMI	
			CS10653 R8L	X		2WD F/S EXT CAB V6 CMI	CMI	
	SUBURBAN	2WD C1500 CWOI	CC10906 CWOI	X				
		4WD C1500 CWOI	CK10906 CWOI	X				
	TAHOE	4-DR 2WD CWOI	CC10706 CWOI	X				
		4-DR 4WD CWOI	CK10706 CWOI	X				
	TRACKER	2-DR 2WD CONVERTIBLE CWOI	CE10367 CWOI	X				
		2-DR 4WD CONVERTIBLE CWOI	CJ10367 CWOI	X				
		4-DR 2WD HARDTOP CWOI	CE10305 CWOI	X				
		4-DR 4WD HARDTOP CWOI	CJ10305 CWOI	X				
	VENTURE	3-DR CARGO EXT WB	1UM06 Z10	X				
		4-DR CARGO EXT WB	1UM16 Z10	X				
		4-DR CARGO EXT WB 1SW CWOI	1UM16 ASW	X				
			1UN16	X		4-DR REG MINIVAN V6 AUTO	TIMING	
DODGE	DURANGO	4-DR 4WD WAGON	DN5L74	X				
	RAM PICKUP	2WD BR1500 QUAD CAB LWB	BE1L34	X				
		2WD BR1500 QUAD CAB SWB	BE1L33	X				
		2WD BR2500 QUAD CAB LWB	BE2L34	X				
		2WD BR2500 QUAD CAB SWB	BE2L33	X				
		2WD BR3500 QUAD CAB DRW	BE3L34	X				
		4WD BR1500 QUAD CAB LWB	BE6L34	X				
		4WD BR1500 QUAD CAB SWB	BE6L33	X				
		4WD BR2500 QUAD CAB SWB	BE7L33	X				
		4WD BR2500 QUAD CAB LWB	BE7L34	X				
		4WD BR3500 QUAD CAB 4WD DRW	BE8L34	X				



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
DODGE	RAM PICKUP		BE1L31	X		2WD BR1500 CLUB CAB 139 WB		2nd or 6th DIGIT CHANGED
			BE1L32	X		2WD BR1500 CLUB CAB 155 WB		2nd or 6th DIGIT CHANGED
			BE6L31	X		4WD BR1500 CLUB CAB 139 WB		2nd or 6th DIGIT CHANGED
			BE6L32	X		4WD BR1500 CLUB CAB 155 WB		2nd or 6th DIGIT CHANGED
			BR2L65	X		2WD BR2500 REG CAB CAB & CHASIS		2nd or 6th DIGIT CHANGED
			BR7L65	X		4WD BR2500 REG CAB CAB & CHASIS		2nd or 6th DIGIT CHANGED
			BE2L31	X		2WD BR2500 CLUB CAB 139 WB		2nd or 6th DIGIT CHANGED
			BE2L32	X		2WD BR2500 CLUB CAB 155 WB		2nd or 6th DIGIT CHANGED
			BE7L31	X		4WD BR2500 CLUB CAB 139 WB		2nd or 6th DIGIT CHANGED
			BE7L32	X		4WD BR2500 CLUB CAB 155 WB		2nd or 6th DIGIT CHANGED
	RAM VAN RAM WAGON	B1500 MAXI-VAN 127 WB	AB1L13		X		DIFSC	
			AB1L51	X		1500 WAGON 109 WB V6	DIFSC	
			AB2L52	X		2500 WAGON 127 WB V8	DIFSC	
			AB3L53	X		3500 WAGON 127WB V8	DIFSC	
FORD	ECONOLINE		E14	X		E-150 RECREATIONAL V6	DIFSC	
			E24	X		E-250 RECREATIONAL V8	DIFSC	
			S24	X		E-250 SUPER RECREATIONAL V6	DIFSC	
			S34	X		E-350 RECREATIONAL V8	DIFSC	
			S34	X		E-350 SUPER RECREATIONAL V8	DIFSC	
	RANGER	4X2 REG CAB SPLASH 112WB	R10 SPL112	X				
		4X2 REG CAB XL 112 WB	R10 XL112	X				
		4X2 REG CAB XL 118 WB	R10 XL118	X				
		4X2 REG CAB XLT 112 WB	R10 XLT112	X				
		4X2 REG CAB XLT 118 WB	R10 XLT118	X				
		4X2 SUPERCAB SPLASH 126 WB	R14 SPL126	X				
		4X2 SUPERCAB XL 126 WB	R14 XL126	X				
		4X2 SUPERCAB XLT 126 WB	R14 XLT126	X				
		4X4 REG CAB SPLASH 112WB	R11 SPL112	X				
		4X4 REG CAB XL 112 WB	R11 XL112	X				
		4X4 REG CAB XL 118 WB	R11 XL118	X				
		4X4 REG CAB XLT 112 WB	R11 XLT112	X				
		4X4 REG CAB XLT 118 WB	R11 XLT118	X				
		4X4 SUPERCAB SPLASH 126 WB	R15 SPL126	X				
		4X4 SUPERCAB XL 126 WB	R15 XL126	X				
		4X4 SUPERCAB XLT 126 WB	R15 XLT126	X				
	WINDSTAR		A51 LTD	X		3-DR WAGON LTD V6	TIMING	98 MODEL 11-21-96 INTRO
GMC TRUCKS	C-K SIERRA PICKUP	C1500 S/S XCAB SLE SWB	C10753 SS	X				
		C1500 W/S EXT CAB SWB 1SV CWOI	C10753 1SV		X		CWOI	
		K1500 S/S EXT CAB SWB	K10753 SS	X				
			TK10753	X		1500 4WD W/S CLUB COUPE 141.5 WB CMI	CMI	
			TC10753	X		1500 2WD W/S CLUB COUPE 141.5 WB CMI	CMI	
	JIMMY		TK20753	X		2500 4WD W/S HD CLUB COUPE 141.5 WB CMI	CMI	
			TC10753	X		1500 2WD S/S CLUB COUPE 141.5 WB CMI	CMI	
		2WD 4-DR WAGON R6V CWOI	TS10506 R6V		X		CWOI	
		4-DR 4WD WAGON YC6 CWOI	TT10506 CWOI	X				
			TS10506	X		2WD 4-DR WAGON W/SLS CMI	CMI	
			TT10506			4WD 4-DR WAGON W/SLS CMI	CMI	





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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
HONDA	S15 SONOMA	2WD W/S EXT CAB 1SV CWOI	S10853 1SV	X				
		2WD W/S EXT CAB R6V CWOI	S10853 R6V	X				
	SAFARI SAVANA YUKON		TS10803	X		2WD SLS S/S REG CAB R6V CMI	CMI	
			TS10803	X		2WD SLS W/S REG CAB 16V CMI	CMI	
			TS10803	X		2WD SLS S/S REG CAB 1SV CMI	CMI	
			TS10803	X		2WD SLS S/S REG CAB V6 CMI	CMI	
			L11006	X		EXT PASSENGER VAN AWD 111 WB V6 CMI	CMI	
			TG11405	X		1500 CARGO VAN W/RV-YF7 V8	DIFSC	
	4-DR 4WD YUKON DENALI		K10706 DEN		X		TIMING	99 MODEL 12-19-97 INTRO
	CR-V	4WD 5-DR LX AUTO	RD184	X				
		4WD 5-DR AUTO W/ABS	RD185	X				
	ODYSSEY		RA386W	X		5-DR 7-PASSENGER VAN LX		3rd DIGIT CHANGED From 1 TO 3
			RA384W	X		5-DR 6-PASSENGER VAN LX		3rd DIGIT CHANGED From 1 TO 3
			RA387W	X		5-DR 6-PASSENGER VAN EX		3rd DIGIT CHANGED From 1 TO 3
	PASSPORT	2WD 4-DR EX AUTO	9B226	X				
		2WD 4-DR EX AUTO W/LEATHER	9B227	X				
		2WD 4-DR LX 5-SP	9B214	X				
		2WD 4-DR LX AUTO	9B224	X				
		4WD 4-DR 5-SP W/WHEEL PKG	9B315	X				
		4WD 4-DR AUTO W/LEATHER	9B327	X				
		4WD 4-DR EX AUTO	9B326	X				
		4WD 4-DR LX 5-SP	9B314	X				
		4WD 4-DR LX AUTO	9B324	X				
		4WD 4-DR LX AUTO W/WHEEL PKG	9B325	X				
INFINITI	QX4		71017	X		4WD 4-DR LUXURY SPORT UTILITY AUTO V6	TIMING	
ISUZU	HOMBRE	2WD REG CAB S AUTO	P14	X				
		2WD REG CAB XS AUTO	P24	X				
		2WD SPACECAB XS AUTO	P54	X				
		4WD REG CAB S 5-SP	T35		X		DIFSC	
		4WD SPACECAB S AUTO	T64		X		DIFSC	
		4WD SPACECAB XS 5-SP	T65		X		DIFSC	
	RODEO		P55	X		2WD SPACECAB XS 5-SP	OP	
			P64	X		2WD SPACECAB XS V6 AUTO	OP	
		2WD 4-DR (4CYL) S 5-SP	P45	X				
		2WD 4-DR LS AUTO	R64	X				
		2WD 4-DR S 5-SP	R45	X				
		2WD 4-DR S AUTO	R44	X				
		4WD 4-DR LS 5-SP	V65	X				
		4WD 4-DR LS AUTO	V64	X				
		4WD 4-DR S 5-SP	V45	X				
		4WD 4-DR S AUTO	V44	X				
	TROOPER		M64	X		4-DR WAGON S W/PRF PKG V6 AUTO	DIFSC	
			M74	X		4-DR WAGON S W/LUX PKG V6 AUTO	DIFSC	
JEEP	CHEROKEE	4-DR 2WD WAGON CLASSIC	XJTL74 CL	X				
		4-DR 2WD WAGON LIMITED	XJTL74 LTD	X				
		4-DR 4WD WAGON CLASSIC	XJL74 CL	X				
		4-DR 4WD WAGON LIMITED	XJL74 LTD	X				



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
JEEP	GRAND CHEROKEE	4-DR 2WD WAGON TSI 4-DR 4WD WAGON 5.9 LIMITED 4-DR 4WD WAGON TSI	ZJTL74 TSI ZJL74 L5.9 ZJL74 TSI	X X X					
LAND ROVER / RANGE ROVER	DISCOVERY	4-DR HARDTOP 4WD LSE AUTO	SDVZ SDVZLSE SDVZ	X X X		4-DR 4WD LE AUTO 4-DR 4WD XD WAGON (LTD EDITION)	DIFSC	LE REPLACES SE MODEL	
LINCOLN	NAVIGATOR	4-DR 2WD WAGON 4-DR 4WD WAGON	U27 U28	X X					
MAZDA	B SERIES PICKUP	4X2 B2500 CAB PLUS SE 5-SP 4X2 B2500 REG CAB SE 5-SP 4X2 B2500 REG CAB SE AUTO 4X2 B2500 REG CAB SX 5-SP 4X2 B2500 REG CAB SX AUTO 4X2 B3000 CAB PLUS SE 5-SP 4X2 B3000 CAB PLUS SE AUTO 4X2 B4000 CAB PLUS SE 5-SP 4X2 B4000 CAB PLUS SE AUTO 4X4 B3000 CAB PLUS SE 5-SP 4X4 B3000 CAB PLUS SE AUTO 4X4 B3000 REG CAB SE 5-SP 4X4 B3000 REG CAB SE AUTO 4X4 B3000 REG CAB SX 5-SP 4X4 B4000 CAB PLUS SE 5-SP 4X4 B4000 CAB PLUS SE AUTO	B25CSE2P B25SSE2P B25SSE2A B25SSX2P B25SSX2A B30CSE2P B30CSE2A B40CSE2P B40CSE2A B3XCSEXP B3XCSEXA B3XSSEXP B3XSSEXA B3XSSXXP B3XSSXXA B4XCSEXP B4XCSEXA	X X X X X X X X X X X X X X X X X				OP	
MERCEDES	M CLASS	ML320 4-DR SPORT UTILITY	ML320	X					
MERCURY	MOUNTAINEER	4-DR 4WD WAGON	U54	X					
MITSUBISHI	MONTERO MONTERO SPORT	4-DR V6 AUTO 4-DR 2WD ES 5-SP	MP45-B AUTO MT45-B 5-SP MT45-P MT45-R MT45-R MT45-P AUTO	X X X X X X					
		4-DR 2WD XLS V6 AUTO		X		4-DR 2WD LS AUTO 4-DR 4WD LS 5-SP 4-DR 4WD LS AUTO	TIMING TIMING TIMING		
NISSAN	FRONTIER PICKUP	2WD KING CAB SE 5-SP 2WD KING CAB SE AUTO 2WD KING CAB XE 5-SP 2WD KING CAB XE AUTO 2WD REG CAB XE 5-SP 2WD KING CAB XE AUTO 2WD STANDARD 5-SP	5325 5321 5355 5351 3355 3351 3305	X X X X X X X					



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MAKE	MODEL	BODY STYLE	CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
NISSAN	FRONTIER PICKUP	4WD KING CAB SE 5-SP	5335	X					
		4WD KING CAB XE 5-SP	5375	X					
		4WD REG CAB XE 5-SP	3375	X					
OLDSMOBILE	BRAVADA SILHOUETTE		V06TV	X		4-DR SPORT UTILITY CMI	CMI		
		4-DR MINIVAN GS REG WB 1SB	3UN16 1SB	X					
			3UM16	X		5-DR MINIVAN GL EXT WB	TIMING		
			M06UV	X		4-DR MINIVAN GL EXT WB CMI	CMI		
			M16UV	X		5-DR MINIVAN GL EXT WB CMI	CMI		
			M06UV	X		4-DR MINIVAN GLS EXT WB CMI	CMI		
			M16UV	X		5-DR MINIVAN GLS EXT WB CMI	CMI		
PONTIAC	TRANS SPORT	4-DR MINIVAN SE REG WB	2UN16	X					
			2UM16	X		4-DR MINIVAN EXT	TIMING		
		4-DR MINIVAN 1SF CWOI	2UN16 1SF	X					
		4-DR MINIVAN 1SG CWOI	2UN16 1SG	X					
		4-DR MINIVAN 1SH CWOI	2UN16 1SH	X					
		4-DR MINIVAN EXT WB 1SH CWOI	2UM16 1SH	X					
			2UM16	X		4-DR MINIVAN EXT WB 1SG CMI	CMI		
			M06V	X		3-DR MINIVAN SE EXT WB 1SG CMI	CMI		
SUBARU	FORESTER	4-DR AWD 5-SP	CA	X					
		4-DR L AWD 5-SP	CB	X					
		4-DR L AWD AUTO	CC	X					
		4-DR S AWD 5-SP	CD	X					
		4-DR S AWD AUTO	CE	X					
		4-DR S C/PKG AWD 5-SP	CF	X					
		4-DR S C/PKG AWD AUTO	CG	X					
SUZUKI	SIDEKICK	4-DR 2WD HARDTOP SPORT JS 5-SP	LSL77C	X					
		4-DR 2WD HARDTOP SPORT JS AUTO	LSL78C	X					
TOYOTA	RAV4	2WD 2-DR SOFT TOP 5-SP	4415		X				
		2WD 2-DR SOFT TOP AUTO	4414		X				
		4WD 2-DR SOFT TOP 5-SP	4425		X				
		4WD 2-DR SOFT TOP AUTO	4424		X				
	SIENNA	4-DR MINIVAN CE AUTO	5322	X					
		4-DR MINIVAN LE AUTO	5332	X					
		5-DR MINIVAN LE AUTO	5334	X					
		5-DR MINIVAN XLE AUTO	5344	X					
	TACOMA		7557	X		4WD LIMITED XCAB 5-SP			LTD REPLACES SR5 MODEL
			7558	X		4WD LIMITED XCAB AUTO			LTD REPLACES SR5 MODEL



De Filippis' LIFO LOOKOUT
Willard J. De Filippis, CPA, P.C.
317 West Prospect Avenue Mt. Prospect, IL 60056
(847) 577-3977 FAX (847) 577-1073
INTERNET: <http://www.defilippis.com>

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