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www.defilippis.com

A Quarterly Update of LIFO - News, Views and Ideas

LIFO LOOKOUT

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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. IRS REVISES FORM 3115 FOR LIFO (AND OTHER) ACCOUNTING METHOD CHANGES.

The IRS has revised Form 3115 and the new Form shows a revision date of December 2003. Other than some general face-lifting, the changes are not significant, and you should be using the new version for filings with the IRS after April 1.

Before you get all choked up about the new Form, you might want to read some of the IRS' own disclaimers about its authorship on forms and instructions. These are included in the article beginning on page 5.

In the next issue of the *Lookout*, we will discuss the changes to Form 3115 in some detail and include a few *Practice Guides* covering some common LIFO changes.

#2. IRS RESISTS USE OF DUAL INDEXES FOR IPIC LIFO CALCULATIONS ... & TEACHES A FEW OTHER LESSONS AS WELL.

In last year's Letter Ruling 200328001, the IRS again expressed its negative attitude toward the use of the dual-index method. This Letter Ruling involved a distributor who was using the Bureau of Labor Statistics/IPIC method, and it provides a refresher on the differences between the earliest acquisition method and a dual index method. They are not the same thing!

Equally significant are other lessons coming out of this LTR for LIFO practitioners who might not be paying as much attention as they should be to the form and content of what they are including on Forms 3115 filed with the IRS. For more, see page 5.

#3. ANY QUESTIONS? THEY'RE ALWAYS WELCOME.

We receive and respond to many questions throughout the year raised by our readers. It's always good to hear from you and meet for the first time by phone or to get reacquainted with some of you longer-term subscribers. As you can see, this is our 14th year of publication, and many of you have been

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with us since the first issue many, many years ago when I was young and energetic.

Your calls or e-mails are always welcome, and they help me to be more aware of areas and issues where you are seeking guidance and/or clarification. Often, your questions result in an article or *Update* discussion in the next issue of the *Lookout*.

In some instances, readers are kind enough to pass along some information they think we might be interested in. We appreciate *all* of your calls and e-mails and are glad to respond to them. Please keep them coming.

#4. YEAR-END LETTER Re: CHANGES IN ACCOUNTING METHODS FOR TRADE DISCOUNTS AND ADVERTISING FEES & EXPENSES.

On pages 2-3, you'll see the letter that we sent out to CPA firms with auto dealer clients reminding them that time was getting short if they wanted to make both changes in method effective for calendar year 2003. If they did, a Form 3115 filing with the IRS was due before December 31 for the change in method for advertising fees and expenses.

see LIFO UPDATE, page 4



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December 1, 2003

Mr. John Smith, CPA
ABC CPA Firm
100 Main Street
City, State Zip

***Re: LIFO Inventories ... Year-End Planning
Desirability and Benefits from Changing Accounting Methods
For Treatment of Trade Discounts and Advertising Fees & Expenses***

Dear John:

It appears that your client, the XYZ Dealership Group, would benefit greatly by changing its methods of accounting for trade discounts (floorplan assistance payments) and for advertising fees and expenses. The schedule enclosed, reflecting December 31, 2002 new vehicle inventory information, estimates that the one-time, 100% fully-deductible-in-the-year-of-change, Section 481(a) adjustment for the dealerships if this change were made for 2003 would be *in the range of \$160,000 to \$180,000*.

You can obtain a better estimate of this potential Section 481(a) adjustment/deduction for 2003 by going to www.greenoutsourcing.com. It takes only a few moments to enter the basic data, and you will immediately have a more accurate projection ... at no cost. Alternatively, you can call me at the number above or Todd Boren at Green Financial Outsourcing Solutions at (214) 350-8197.

At the AICPA Conference in San Antonio in October, I devoted a portion of my presentation on LIFO discussing the fact that many dealers are not properly recording trade discounts in accordance with the Regulations and Revenue Ruling 84-41. This holds true regardless of whether or not the dealership is using LIFO to value its new vehicle inventories.

We have been actively involved with many dealerships and CPAs during the year assisting them in making the appropriate changes in accounting method. For dealers on LIFO, the most beneficial aspect of making these changes is the fact that they receive a significant income tax deduction in the year of change as a result of making these changes.

I have written extensively on these changes in accounting method in the September 2003 issue of the *LIFO Lookout*. If you are not thoroughly familiar with the tax requirements and ramifications of this matter, you should find out more about it before December 31, 2003. You can see the information from the first page of the September 2003 LIFO Lookout on our web site at www.defilippis.com.

(Continued)



Below are three related client management issues for your consideration.

1. Have the ramifications and benefits of the change in accounting method been explained to the dealer/client?
 - If possible changes in accounting method have been discussed, but the dealer has decided not to make the changes, is there a memorandum in the file documenting this discussion with the client and the rationale for not making these changes at this time?
2. Regardless of how the client/dealer feels about the accounting for trade discounts, what is the Firm's position, liability and/or responsibility for not changing to the correct method/treatment for trade discounts?
 - *It is clear that it is incorrect to include trade discounts as inventory costs. (Where do you stand ... and why?)*
3. If the dealer resists making this change ... despite the (significant) tax benefit from doing so, you or your CPA firm may be signing an income tax return that reflects inventory values that have not been reduced for trade discounts in accordance with the Regulations.
 - In this case, technically, the dealership's income tax return should include a special form, Form 8275-R, to indicate that the tax return you are filing reflects a method of accounting that is not authorized by the income tax regulations

If your schedule permits, we should talk about this fairly soon since all of this requires action, and in some cases, certain filings with the IRS before December 31.

Sincerely,

Willard J. De Filippis, CPA

THE XYZ DEALERSHIP GROUP

DEALERSHIPS VALUING NEW VEHICLE INVENTORIES USING LIFO

LIFO RESERVE BALANCES AS OF DECEMBER 31, 2002

Dealership Name	Pool #1 - New Automobiles			Pool #2 - New Light-Duty Trucks			Both Pools Combined - Total		
	Current Cost	LIFO Valuation	LIFO Reserve	Current Cost	LIFO Valuation	LIFO Reserve	Current Cost	LIFO Valuation	LIFO Reserve
Dealership #1	4,500,000	2,804,853	1,695,147	3,800,000	3,313,656	486,344	8,300,000	6,118,509	2,181,491
Dealership #2	1,900,000	1,188,403	711,597	1,000,000	781,939	218,061	2,900,000	1,970,342	929,658
			0			0	0	0	0
			0			0	0	0	0
Totals	6,400,000	3,993,256	2,406,744	4,800,000	4,095,595	704,405	11,200,000	8,088,851	3,111,149
		<u>2,406,744</u>				<u>704,405</u>			<u>3,111,149</u>

FOR DISCUSSION PURPOSES ONLY

8,088,851
x .020
161,777

8,088,851
x .022
177,955



You might want to consider this letter for your own purposes in connection with any fiscal year clients or for other use later this year.

Here's a summary of the responses we received to the letters we sent out. It was roughly ... 1/3 - 1/3 - 1/3. One-third of the CPAs did not even bother to respond. One-third responded, and Forms 3115 were filed to make the changes for 2003. The last third said that they appreciated the notification, but that their "tax planning was already in place for 2003 and (their client) didn't need the deduction." Most of them added, however, that they definitely will want to make the changes for 2004.

So there's more work ahead for us on this and you'll hear more about this subject in subsequent issues of the *LIFO Lookout*.

#5. COMPARISON OF IRS & SUPERLIFO "UNOFFICIAL" NEW ITEM DETERMINATIONS.

Over the years, we have compared our *SUPERLIFO* new item determinations with those made by the office of the IRS Motor Vehicle Technical Advisor.

Many CPAs and/or dealers are using service bureaus for their LIFO calculations. Other firms still do their own new vehicle LIFO calculations and must be making these new item determinations each year for themselves.

The last comparison, involving model years 2002-2003 appeared in the June 2003 *LIFO Lookout*. We have made a similar detailed comparison for the model year 2004 new items based on the lists the IRS released in March, 2004. Our overview begins on page 12, and the detailed side-by-side comparisons for autos and light-duty trucks follow on pages 16 through 31.

In general, this year, there were no major situations where we treated a vehicle as a new item and the IRS treated it as continuing. However, there were some major situations where the IRS concluded that a vehicle was a new item and we disagreed ... Specifically, the Ford F-150 Heritage trucks and the Mercury Mountaineer.

Here's the story behind the *F-150s* ... Ford *F-150 Heritage* - 20 items - these vehicles were named *F-150* for 2003 and previous years. For the 2004 model year, Ford redesigned its line of half-ton trucks (*F-150* for 2004), but with the popularity of the previous model still strong, it decided to sell the carryover

Heritage model (*F-150* for 2003) for at least another year. There were 40 *F-150* models in 2003; for the 2004 models, Ford reduced the number to 20 and renamed them *F-150 Heritage*. Both models will be sold side-by-side for about 12 months. There were no changes made to this vehicle, nor were the Manufacturers Codes changed. We show them as **continuing** models, whereas the IRS shows them as **new** items on its list.

The Mercury *Mountaineer* reflects a different situation. First, some background: In compiling the previous years' comparative lists, both *SuperLIFO* and the IRS showed the Mercury *Mountaineer* as a new item. So, those vehicles have already been treated as new items once ... the year before last.

When the Factory intro price list for '04 models came out in May 2003, the Manufacturers Codes were identical to those it used in the prior year. In other words, there was no change in the Manufacturers Codes. When the Factory issued a subsequent price change list for these vehicles in November 2003, the price list showed 10 models with a different Manufacturers Code. Actual invoices reflecting these November 2003 price changes give no indication that there is a new Manufacturers Code. Accordingly, we have treated these models as **continuing** items, whereas the IRS shows them as **new** items on its list.

It appears to us that in compiling its new items list, the Service has made some significant errors this time around. The transmittal letter for the IRS New Items List includes the following ... "**Since the list is not an 'Official List,' it does not reflect 'Service Position' and examiners are not required to follow it.**" We would caution you to not necessarily accept the Service's conclusions if you are challenged on some of these items by the IRS.

#6. ESCAPING FULL REPAYMENT OF TAX ON LIFO RESERVES.

The recapture of tax on LIFO reserves in liquidation is usually thought to be as certain as death and taxes. But, is it?

In a number of situations, auto dealers and other taxpayers using LIFO have been able to significantly minimize the tax impact of the inevitable LIFO reserve recapture upon liquidation.

They've been able to do this by planning ahead and using strategies offered by Midcoast Investments, Inc. We are considering providing more details on this in an upcoming article. Would this be of interest to you? *

IRS DISALLOWS USE OF DUAL INDEX METHOD FOR IPIC LIFO CALCULATIONS

... AND TEACHES A FEW OTHER LESSONS, AS WELL

INTRODUCTION

Dual indexes. Over the years, we've written a number of articles on the so-called "dual index" LIFO method and the advantages it affords taxpayers who are willing to sacrifice some element of accuracy in their financial statements as a trade-off for having larger LIFO reserves. See *"Why Taxpayers Prefer to Use Dual Indexes for Valuing LIFO Reserves."* (*LIFO Lookout*, September 2002, page 20).

It's no secret that the IRS does not look favorably on the use of the dual index method. See *"IRS Publishes Appeals Settlement Guidelines for LIFO Cases Involving Dual Index Methods."* (*LIFO Lookout*, September 2002, page 18). A recent Letter Ruling/TAM 200328001 just adds to that conclusion.

BLS-IPIC method. For taxpayers who don't want to compute their own (internal) LIFO price inflation indexes, the IPIC method offers the alternative of using inflation indexes computed by the Bureau of Labor Statistics. These are generally referred to as "external" indexes to indicate that the inflation measurement has not been determined based on the taxpayer's own experience. Under the surface, there's a lot of technicality, but that's the real essence (some say the beauty) of the IPIC method.

One thing that attracts practitioners to the IPIC method is that the IRS is more inclined to accept the Bureau of Labor Statistics inflation calculations than it is to accept inflation calculations that are the "creations of the taxpayer." (Think *Frankenstein* here.) From a LIFO practitioner's standpoint, when confronted with a LIFO methodology that may be difficult (or even impossible) to defend, a change to the IPIC method often is the best "last train out."

In other words, by changing from a less defensible, more aggressive, LIFO method to a more passive and less beneficial IPIC method, taxpayers basically will obtain a huge benefit: audit protection for their prior year LIFO calculations.

FACTS IN LTR 200328001

In a recent Letter Ruling, the National Office was asked to address a situation involving the combination of the use of a dual index methodology and the use of the IPIC method. The application situation was somewhat unusual because it involved years before and during the replacement of the Temporary IPIC Regulations by the Finalized IPIC Regulations. (See

"Highlights of the Final IPIC Regulations," LIFO Lookout, December 2002, page 8). As a result, the availability of relief under Section 7805(b) for the taxpayer also was an issue.

The taxpayer involved in this ruling is a national distributor of certain products who used the First-In, First-Out (FIFO) basis before changing to LIFO. Then it changed to using a dollar-value, link-chain LIFO method and determined the current-year cost of its inventory using the most recent purchases method. Under this method, the taxpayer determined the total current-year cost of items making up its inventory pool by reference to the actual cost of goods most recently purchased or produced.

Subsequently, the taxpayer filed a Form 3115, *Application for Change in Accounting Method*, and requested the Commissioner's consent to change its LIFO method of accounting from the dollar-value, link-chain method to the IPIC method. In that Form 3115, the taxpayer also requested the Commissioner's consent to change its method of determining current-year cost from the most recent purchases method to the earliest acquisition method. In connection with this proposed change, the taxpayer selected the first month of its fiscal year as an appropriate representative month for selecting indexes. The taxpayer's Form 3115 did not indicate that it was requesting any other change in method for its LIFO inventory.

After reviewing the Form 3115 submitted by the taxpayer, the National Office issued a Letter Ruling that granted the taxpayer's proposed change in method for its LIFO inventory. In doing so, the Letter Ruling specifically provided that the taxpayer would use the first month as the appropriate representative month for selecting indexes to be used in determining the current-year cost of the inventory pool.

The ruling letter also contained the usual caveats, including the provision that "Whether the selection of the Producer Price Indexes to be used to compute an inventory price index is appropriate and the computations incidental to the use of such indexes are proper, will be determined in connection with the examination of [taxpayer's] ... Federal income tax return."

As it turned out, the taxpayer did not keep track of the actual cost of its purchases in the order of acquisition as required by Reg. Sec. 1.472-8(e)(ii)(b).

see **IRS DISALLOWS USE OF DUAL INDEX METHOD**, page 6



IRS Disallows Use of Dual Index Method

What the taxpayer did instead was to use a dual index LIFO methodology. Under its dual index method, the taxpayer determined the current-year cost of its ending inventory by reference to the actual cost of its most recent purchases. The taxpayer then used an end-of-the-year index (the current-year deflator index) that it computed from the Producer Price Index Detailed Report to measure the inflation that had occurred during the current year.

Next, the taxpayer used this current-year deflator index to compute a current-year cumulative deflator index by multiplying the current-year deflator index by the cumulative deflator index from the prior year. The taxpayer then applied this computed cumulative deflator index to deflate its ending inventory stated at current-year costs to base-year costs in order to determine whether an increment in its inventory quantity had occurred. An increment in the inventory occurred if the ending inventory stated at base-year cost was greater than its beginning inventory stated at base-year cost.

When the calculation showed that the taxpayer had experienced an increment in its inventory, it computed the LIFO value of the increment by multiplying the increment stated at base-year cost by an "inflator index" which was different from the index that it had used to deflate its ending inventory.

Upon audit of the taxpayer, the IRS determined that

- The taxpayer had failed to implement the change in method of accounting that it was granted in the National Office's Letter Ruling, and
- The selection of the first month in the taxpayer's fiscal year as the representative month for IPIC purposes was not appropriate.

The taxpayer disagreed, and the result was a request to the National Office for Technical Advice.

USE OF DUAL INDEX METHOD

The basic issue in LTR 200328001 was what to do with the taxpayer's LIFO calculations where the taxpayer had previously received the Commissioner's consent to use the "earliest acquisition" method but failed to do so, using instead a "dual index" method which was not in accordance with a previous consent granted by the National Tax Office (NTO).

The issue was set up as follows ... Can the IRS agent change the taxpayer's method of determining the current-year cost of items making up its inventory pool when the taxpayer received the Commissioner's consent to use the "earliest acquisition" method but instead used a "dual index" method? The answer was that **the agent could make the change.**

(Continued from page 5)

The previous NTO Letter Ruling granted the taxpayer permission to use the **earliest acquisition method** to determine the current-year cost of the items making up its inventory pool. However, the taxpayer did not use the earliest acquisition method, but instead used a dual index method. According to the IRS, the taxpayer's change in method was unauthorized, and the examining agent was empowered to change the taxpayer back to the original method it had used for determining current-year cost ... and that original method was the **most recent purchases method**.

The resolution of this issue hinges on having the correct understanding of what is meant by the term **earliest acquisition method**.

The IRS said that, contrary to the taxpayer's arguments, a dual index method is not per se the same as the earliest acquisition method described in the Regulations. Reg. Sec. 1.472-8(e)(2)(ii)(b) provides that a taxpayer may determine the total current-year cost of items making up a pool by reference to the actual cost of the goods purchased or produced during the taxable year in the order of acquisition.

In contrast, under the dual index method used by the taxpayer, the taxpayer continued to use the most recent purchases method to determine the current-year cost of the items making up its inventory for purposes of determining whether a quantitative change (i.e. an increment) had occurred in its inventory. Then, when its inventory experienced an increment, the taxpayer determined the current-year cost or value of the increment using a price index that was intended to approximate the results that may be derived from the use of the earliest acquisition method.

In other words, the taxpayer's dual index method did not determine the current-year cost of the items making up its pool by reference to the actual cost of the goods purchased during the year in order of acquisition. Therefore, it was not (consistent with) the earliest acquisition method described in the Regulation.

In overriding the taxpayer's arguments in defense of its use of the dual index method, the IRS distinguished four previous TAMs on the subject ... 9853003, 9444002, 8749005, and 8437004. The National Office said that the taxpayer's reliance on these memoranda for the proposition that a dual index method is not per se prohibited, was misplaced.

Here's what the IRS said about these rulings.

1. First, they all clearly state that they should not be used or cited as precedent. [Section 6110(k)(3)]

see IRS DISALLOWS USE OF DUAL INDEX METHOD, page 8

WAS THE FORM 3115 CLEAR & UNAMBIGUOUS? WHO SHOULD HAVE KNOWN WHAT?

Taxpayer's (Unsuccessful) Arguments ...

- It should have been evident from both the precise language of its Form 3115 and the Letter Ruling issued by the National Office that the taxpayer had received the Commissioner's consent to use a dual index method.
- Although neither the Letter Ruling nor the Form 3115 explicitly disclosed that the taxpayer was intending to use a dual index methodology, *"persons familiar with the dollar-value LIFO method would have understood this."*
- The National Office *must have been aware* that the taxpayer was proposing to use "dual indexes" because under both the IPIC method and the link-chain method, price indexes are used for two separate and distinct purposes. The first purpose is to determine whether the inventory has experienced a quantitative change (i.e., whether an increment or decrement has resulted). The second purpose is to inflate any resulting increment stated at base-year dollar cost equivalents to its corresponding current-year dollar cost equivalents.
- The Form 3115 the taxpayer submitted to the IRS *fully disclosed* that the taxpayer was going to continue to use an end-of-the-year (i.e., a most recent purchases) method and index in order to determine whether its inventory had experienced a quantitative change. This was evident from the fact that the Form 3115 only indicated that the taxpayer was going to change its "method used to figure the cost of goods in the closing inventory over those in the opening inventory" (i.e., the method used to determine the current-year cost of an increment).
- Previously issued Technical Advice Memoranda supported its position that a dual index method is not per se prohibited. ... PLR 9853003, PLR 9444002, PLR 8749005, and PLR 8437004.
- *If the Form 3115 the taxpayer had submitted was ambiguous, then it was the responsibility of the National Office to request additional information.*

SELECTED ARTICLES FROM THE LIFO LOOKOUT

Dual Index LIFO Methodologies

IRS Publishes Appeals Settlement Guidelines on for LIFO Cases

Involving Dual Index Methods	September, 2002..pg. 16
Comments from the Guidelines on Short-Cut & Turnover Methods.....	September, 2002..pg. 19
Why Do Taxpayers Want to Use Dual Indexes?	September, 2002..pg. 20
Dollar-Value LIFO Methods ... Technicalities.....	September, 2002..pg. 22
Rev. Proc. 97-37: Current Year Cost Determinations	September, 1997..pg. 26
Earliest Acquisitions Method for Valuing Increments (Sept., 1995 & Sept., 1994)	June, 1996.....pg. 10
Final IRS Issue Paper Limits Use of Dual Indexes	June, 1996.....pg. 10
LTR 9444002: Valuing Increments where CPI Method Is Used.....	December, 1994..pg. 24
Earliest Acquisitions Method for Valuing Increments - ISP Update (Sept., 1994).....	September, 1994..pg. 18
Should A Start-Up Business Elect LIFO in its First Year?	March, 1994.....pg. 10
Dual Index Approaches and Procedures	September, 1993..pg. 8
Dual Index Start-Up Situation Example	September, 1993..pg. 11

IPIC (Inventory Price Index Computation) Method

Highlights of the Final IPIC Regulations	December, 2002..pg. 8
BLS/IPIC Regulations Proposed Changes for LIFO Taxpayers Using CPI-PPI Indexes	
Overview of the IPIC Changes.....	September, 2000..pg. 11
Evaluation of the Proposed Changes.....	September, 2000..pg. 15
Common Errors in Applying the IPIC Method	September, 2000..pg. 16
The IPIC Method Does Not Preclude Link-Chain Computations...FSA 200004008..	March, 2000.....pg. 12
More on Application of BLS-IPIC Method to Auto Dealers' Inventories	December, 1998..pg. 3



2. Second, although the memoranda do seem to indicate that a dual index method may be proper if its use results in a clear reflection of income, this sort of statement without further explanation is self evident. As a general rule, a method of accounting is proper if it clearly reflects a taxpayer's income. Therefore, the propriety of a dual index method generally was not the issue in any of these memoranda. Instead, these memoranda really addressed whether a specific taxpayer's dual-index method clearly reflected that taxpayer's income. Any statement in those memoranda concerning the propriety of a dual-index method generally was merely dicta. Moreover, in each case, the Service decided that the taxpayer's dual index method did not clearly reflect income.

3. None of the memoranda provide any guidance as to when and under what circumstances a dual index method would clearly reflect a taxpayer's income.

4. Lastly, none of the cited memoranda indicates that a dual index method is the earliest acquisition method that is provided by the Regulations. **Note:** This is the key technical point and it requires an understanding of the difference in the underlying computational mechanics. This is where an inexperienced LIFO practitioner often will assume that if two indexes are being used, that automatically or per se constitutes an earliest acquisition approach. And, that is not the case.

According to the National Office, the taxpayer had only received consent to use the **earliest acquisition method**. It had not received consent to use some other proper method. Therefore, the National Office treated all of the taxpayer's arguments about the propriety of a dual index method as irrelevant. For more on the taxpayer's contentions and the IRS' rebuttals, see pages 7 and 9.

WAS THE FORM 3115 DISCLOSURE AMBIGUOUS AND/OR INCOMPLETE?

The following discussion is one to which many LIFO practitioners can relate. In essence, the issue was What was said? ... or What should have been said? ... in order to provide "full disclosure" to the National Office in its consideration of the requested change in accounting method.

The National Office said, "Although Taxpayer may have attempted to fully and honestly provide all the information requested on the Form 3115, the form still lacked certain information." According to the IRS, "...The Form 3115 did not **clearly disclose** that Taxpayer was going to use dual indexes." (Emphasis added.)

The discussion continued, "...The National Office did not understand from Taxpayer's Form 3115 that it was **only** requesting to change its method of determining current-year cost for purposes of determining the value of a resulting increment and not for purposes of determining whether a quantitative change occurred." (Emphasis added.)

The Service said that the taxpayer's Form 3115 was unclear regarding the change(s) it was requesting. It added that if an ambiguity existed with regard to the taxpayer's proposed change, it was the taxpayer ... and not the National Office ... who had the duty to rectify the ambiguity. The taxpayer has to bear the burden of completing a Form 3115 so as to accurately notify the National Office of a requested change in method of accounting.

SELECTION OF APPROPRIATE REPRESENTATIVE MONTH

This second issue had two parts ... (1) Should the National Office revoke its previous Letter Ruling in which it had granted the taxpayer permission to select the first month of its fiscal year as the representative month for purposes of the IPIC method, and (2) if so, what month would be most appropriate for determining current-year cost?

A taxpayer using the IPIC method that does not use the retail inventory method must select indexes as of the month or months most appropriate to the taxpayer's method of determining the current-year cost of the inventory pool. [Reg. Sec. 1.472-8(e)(2)(ii)] Alternatively, an IPIC taxpayer may make a one-time binding election of an appropriate representative month during the taxable year.

For this purpose, an appropriate representative month must be a month that has a nexus, or a relationship, to the taxpayer's method of determining current-year cost and its historical experience of inventory purchases during the year.

Since the taxpayer did not implement the method for which consent was granted in the previous Letter Ruling, the IRS could change the taxpayer back to its old method (i.e., the most recent purchases method). When a taxpayer uses the most recent purchases method to determine its current-year cost, an appropriate representative month is almost invariably a month that is near the end of the year (assuming uniform purchases during the year). Under these circumstances, the Service simply won't allow taxpayers to use a month near the beginning of the year.

The Ruling added that when the taxpayer was granted consent to use a month earlier in its fiscal year as an appropriate representative month, the

see IRS DISALLOWS USE OF DUAL INDEX METHOD, page 10



WAS THE FORM 3115 CLEAR & UNAMBIGUOUS? WHO SHOULD HAVE KNOWN WHAT?

IRS' Overriding Rebuttals

- Taxpayer's Form 3115 indicated that it was going to use the earliest acquisition method, but made no reference to its use of dual indexes.
- Taxpayer's Form 3115 did not clearly indicate that it was going to continue to use a most recent purchases method to determine quantitative changes in its inventory.
- Taxpayer's dual index method did not determine the current-year cost of the items making up its pool by reference to the actual cost of the goods purchased during the year in order of acquisition. Therefore, Taxpayer's dual index method was not the earliest acquisition method that is described in Reg. Sec. 1.472-8(e)(2)(ii)(b). (The IRS cites here *Mountain State Ford v. Commissioner*, 112 T.C. 58 [1999]).
- Since Taxpayer's dual index method is not the earliest acquisition method contemplated by the regulations, the **National Office would not have "understood"** that the taxpayer had requested permission to use a dual index method.
- Taxpayer's argument concerning the precise language of the Form 3115 is unpersuasive in that ***Forms and Instructions are not authoritative***. Taxpayer is not entitled to distill the tax law from the language of the Form 3115. Generally, Forms and Instructions do not bind the Service and are not intended to replace the law or change its meaning. The sources of authoritative law in the tax field are the statutes and Regulations, and not the informal publications and Tax Forms that are published by the Internal Revenue Service. ... (citations omitted) ... ***"Therefore, taxpayers who rely on IRS Forms and Instructions are at risk."***
- The risk to which taxpayers (inadvertently) expose themselves is evidenced by the following. A careful reading of the Regulation Section that provides the methods to determine current-year cost when a taxpayer uses the dollar-value LIFO inventory method reveals that ***the language of the Form 3115 is not fully consistent with the language contained in Reg. Sec. 1.472-8.***
 - ♦ The language contained on the Form 3115 tracks the language contained in Reg. Sec. 1.472-2(d). This applies to a taxpayer that values its LIFO inventory ***using a unit method***. In contrast, Reg. Sec. 1.472-8(e)(2) is the relevant Regulation Section when a taxpayer values its LIFO inventory using the dollar-value method. The language of this Regulation is slightly different than that provided by Reg. Sec. 1.472-2(d) and provides that a taxpayer may determine the total current-year cost of items making up a pool by using one of several methods: either (1) the most recent purchases method, (2) the earliest acquisition method, (3) an average unit cost method, or (4) any other proper method.
- When the National Office issued its letter ruling, it was aware of the different language contained in each Regulation Section. Therefore, the National Office ***likely would have assumed that***, since the taxpayer was using the dollar-value LIFO method, it was requesting to change its method of determining current-year cost for the items making up its pool and ***not only*** its method for purposes of valuing an increment.
- When a taxpayer files a Form 3115 requesting the Commissioner's consent to a change in method of accounting, the taxpayer has "a duty to reveal all material factors pertinent to its request for an accounting method change." Taxpayers cannot shift this burden to the National Office. The taxpayer's argument concerning the National Office's duty to seek additional information is not consistent with precedent. See *Cochran Hatchery, Inc. v. Commissioner*, T. C. Memo. 1979-390.



IRS Disallows Use of Dual Index Method

National Office must have assumed that the taxpayer would use the earliest acquisition method in order to determine the current-year cost for purposes of determining not only the value of an increment, but also whether a quantitative change had occurred in its inventory pool.

Since this assumption by the National Office was in error, the Letter Ruling could be revoked, but only to the extent that it provided the taxpayer with consent to use (1) the earliest acquisition method and (2) that earlier month as an appropriate representative month. Because the Examination Division (i.e. the IRS auditor) said it would change the taxpayer's method from a dual index method to the most recent purchases method, the month or months most appropriate is invariably a month towards the end of the taxpayer's taxable year.

SECTION 7805(b) RELIEF

A third issue in the Letter Ruling followed from the Service's decision to revoke its previous Letter Ruling. That issue was whether the taxpayer should be granted relief under Section 7805(b). Ordinarily, when the Service revokes a Letter Ruling that it has previously issued, that revocation applies to all years open under the statute of limitations unless the Service exercises its discretionary authority to limit the retroactive effect of the revocation.

Each request for relief is considered on its own individual merits, and the National Office concluded that there was "sufficient question regarding the meaning of the information that the taxpayer provided the National Office in its Form 3115."

In this case, the National Office granted Section 7805(b) relief to the taxpayer. As a result, the effect of the revocation of the previous Letter Ruling was not applied to tax years beginning before the date that the taxpayer received notification of the revocation. At least this didn't turn out badly for the taxpayer.

CLARIFICATION: IPIC METHODS NOW CANNOT EMPLOY DUAL INDEXES

Letter Ruling 200328001 involves the question of whether a taxpayer is permitted to use a dual index method to determine the current-year cost of items making up its inventory pool when it uses the IPIC method. This question arose because of the years involved in the underlying fact pattern.

Practitioners should be aware that now the final Regulations do not allow taxpayers using the IPIC method to use dual indexes with two appropriate months for selecting such indexes. The Regulations state that "using one IPI (inventory price index) to

(Continued from page 5)

compute the base-year cost of a dollar-value pool for the current taxable year and using a different IPI to compute the LIFO inventory value of the current taxable year's layer is **not** permitted under the IPIC method."

IPIC taxpayers who were previously using a dual index method, were granted automatic consent to change to a method permitted by the new Regulations in either their first or second year ending on or after December 31, 2001 [Reg. Sec. 1.472-8(e)(3)(v)(B)].

SIGNIFICANCE OF LTR 200328001

This Letter Ruling updates our understanding of the IRS attitude towards taxpayers who attempt to use dual index LIFO methodologies. Equally interesting are its discussions related to some everyday issues LIFO practitioners run into.

1. When there is less than (what the IRS considers to be) "full disclosure" on or accompanying a Form 3115, what can or should the taxpayer be entitled **presume** that the National Office will know or assume about what is going on?

In other words, should you "dare" to fully disclose or take your chances on offering less than full disclosure?

2. Just how much can a taxpayer rely on Form 3115 and the instructions? This applies to either making a change in accounting method where permission to make the change is **automatically** granted or in requesting permission to change in situations that are not **automatic**.

You may be surprised at how severely the IRS disparages the Form which it usually holds up as the Holy Grail for accounting changes (when it is to its advantage to do so.)

3. If you are currently using a dual index method for your LIFO calculations, you may want to study closely how the Service distances itself from prior Letter Rulings and TAMs which involve the use of dual index methods. These are, according to the IRS, situations all revolving around "clear reflection of income" determinations.

The IRS' comments may not come as a surprise to you. But they may be enough to move you to reconsider what you are doing in some instances and possibly even convince you to buy a ticket on the "last train out," whose destination is the IPIC safe harbor.

Further thoughts on these discussions and their application to everyday LIFO practice are on the facing page. *



FORM 3115 DISCLOSURES ... PRACTICE COMMENTS

***Duty to
Disclose All
Material Facts
&
Reveal All
Material Factors***

- One interpretation of this Letter Ruling is simply that *the taxpayer will lose whenever it tries to rely on its own vague or sketchy attempts to fill out a Form 3115.*
- When a taxpayer files a Form 3115 requesting the Commissioner's consent to a change in method of accounting, the taxpayer has "a duty to reveal all material factors pertinent to its request for an accounting method change."
- It is not the responsibility of the National Tax Office to try to ferret out all of the pertinent information. And, the taxpayer cannot shift this burden to the National Office.
- In *Cochran Hatchery, Inc. v. Commissioner*, (T.C. Memo 1979-390), the taxpayer was granted permission to change from an accrual method of accounting to the cash receipts and disbursements method of accounting (cash method). In requesting the change, the taxpayer fully and honestly provided all of the information requested on the Form 3115, *but it failed to disclose that most of its sales were to a related party.*
 - ♦ In part, the Service granted the requested change based on the taxpayer's representation that there was a long delay between the time of the sale and the receipt of payments on accounts receivable.
 - ♦ Subsequently, the Service discovered that most of the taxpayer's sales were to a related party, and it retroactively revoked the Letter Ruling.
 - ♦ The Tax Court held that the revocation was justified, and it was not an abuse of discretion by the IRS. The Court said, "It would be exceedingly difficult, if not impossible, for [the Commissioner] to design specific questions covering every conceivable circumstance relating to an accounting method change."

***When in Doubt,
Better to Err
on the Side of
Fuller Disclosure***

- This Letter Ruling reinforces a position about which we have always felt very strongly.
- In connection with Form 970 and Form 3115 filings, it has been our practice to *always, every time, without exception*, include a schedule showing the computation format that will be followed in the LIFO methodology that is either being elected or to which the taxpayer is requesting permission to change.
- For example, see our proforma computation packages.
- Some practitioners have said that they felt it was unnecessary to include an extra page or schedule which might simply draw more IRS attention to what was being done.
 - ♦ Our opinion has consistently been that adding a schedule showing the computation format should avoid any possible controversy in the future over how the IRS might interpret the changes we were electing or making.
 - ♦ This disclosure practice is especially crucial in situations where a dual index method is being used.

***With Form 3115,
the Service Says
"Heads-We-Win,
Tails-You-Lose"***

- Note the "heads-we-win, tails-you-lose" attitude the IRS expressed concerning the content of its own Forms and Instructions ... especially in its reference to Form 3115.
- In the Ruling, the Service brushed off all of the taxpayer's arguments involving its reliance on or understanding of Form 3115.
 - ♦ ... "Generally, forms and instructions do not bind the Service and are not intended to replace the law or change its meaning. The sources of authoritative law in the tax field are the statutes and regulations and not the informal publications and tax forms that are published by the Service ... (citations omitted). *Therefore, taxpayers who rely solely on IRS forms and instructions are at risk.*"
- One would think or hope that the IRS would be more careful in drafting Forms and Instructions and be more willing to stand behind them.

***Form 3115 Is
Inconsistent with
the Regulations ...
and the IRS Is
Aware of It***

- In connection with filing Forms 3115 for certain LIFO changes, taxpayers should be aware that the language of the Form 3115 is not fully consistent with the language in Reg. Sec. 1.472-8 which provides for methods to determine current-year cost when a taxpayer uses the dollar-value LIFO inventory method.
 - ♦ This is truly a "gotcha" ... and the IRS pulls no punches in making that peril apparent to the taxpayer. ...How about at least a warning somewhere in the dozens of pages of instructions?



COMPARISON OF SUPERLIFO & IRS NEW ITEM DETERMINATIONS FOR NEW VEHICLES IN YEAR-END 2003 INVENTORIES

We are pleased to present our **SUPERLIFO** 2004 New Items Lists in a Report comparing our determinations of new items with those recently made available by the office of the IRS Motor Vehicle Technical Advisor in Grand Rapids, Michigan.

The IRS lists can be found in IRS Publication 1947 (Rev. 03-04), Catalog Number 24599W. These were distributed with a cover letter dated March 9, 2004, which includes the following statement ... ***"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 IRS used the following sources to compile its New Items Lists... *Edmunds.com*, *Kelley Blue Book New Car Price Manual* (Fourth Edition, 2003 through Second Edition, 2004), *Automobile Magazine*, *Automotive News*, and when available, product brochures, manufacturers' price lists and vehicle order guides.

HOW TO INTERPRET OUR **SUPERLIFO** - IRS COMPARATIVE REPORT

Our Comparative New Item Report covers 16 pages. New automobiles are on pages 1 through 7; new light-duty trucks (including sport utility vehicles, minivans and off-roads) are on pages 8 through 16. The Report shows complete make, model, body style, model code and item category information.

The left-hand side of each Report page shows our **SUPERLIFO** New Items List.

The right-hand side of the Report (including the "Yes" column) shows the IRS' Motor Vehicle Industry Specialist's new item listing.

To make it easier to identify the differences in our respective new items listings, where a *new* item on our List also appears on the IRS' list, that detailed item category has not been listed again on the right-hand side.

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 IRS 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 indicates an item category 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 (with model numbers) which the IRS concluded were new items, but which we concluded were not. ***For example, note the treatment of twenty (20) Ford F-150 Heritage trucks by the IRS as new items, which treatment, in our opinion, is incorrect.***

If an "X" appears in the "No" column, that item category is listed on the left-hand (i.e., **SUPERLIFO**) side, and that "X" indicates an item category that we treated as *new*, but which the IRS did not.

We carefully reviewed our new item determinations and compared them with the IRS lists. The IRS also used a calendar year cut-off, rather than a model year cut-off, in compiling its list. This eliminated many items that otherwise might have been differences resulting from overlapping time periods. But in some instances, varying introduction dates created differences in our respective determinations.

In summary: Everything listed on the left-hand (our) side with an "X" in the "Yes" column is an item category where we agree with the IRS that it is a *new* item. Everything with an "X" in the "Yes" column is on the IRS' new item list. Everything listed on the right-hand (IRS) side of the page is an item category that the IRS considers to be *new*...and we do not. Finally, everything with an "X" in the "No" column is something that we conclude should be a *new* item category, but the IRS does not.

With respect to the December 31, 2003 year-end vehicles, we identified 580 new item categories (222 autos and 358 light-duty trucks) whereas the IRS identified 550 (221 autos and 329 light-duty trucks). We both reached the same conclusion on 434 new items.

We identified 66 item categories as *new*, but the IRS determined them to be *continuing*. The IRS identified 65 items as *new*, but we concluded they should be treated as *continuing* items.

A table summarizing the details of these differences in treatment appears on page 14.

In general, this year, there were no major situations where we treated a vehicle as a new item and the IRS treated it as continuing. However, there were a few major situations where the IRS concluded that a vehicle was a new item and

→



we disagreed ... Specifically, the Ford F-150 Heritage trucks and the Mercury Mountaineer. (See discussion in Update Item #5 on page 4.)

In some instances, we understand why we disagree with the IRS; in other situations, we're not quite sure why we don't agree—other than possibly because of conflicting information or timing differences in our respective resources.

The legend on the cover page of the Report explains the abbreviations in the "comment code" column. In the *Comments* column, the terms "Admin Code Change" refers to an IRS-specific designation in its listings which reads "Administrative Model Code Change" explaining why the IRS treated that item as a continuing item rather than as a new item. In these instances (i.e., where "Admin Code Change" appears), there exists a real difference in interpretation between *SuperLIFO* and the IRS. ***One example of this is the Chrysler Sebring.***

In contrast, where our *SuperLIFO* analysis has treated a vehicle as a continuing item even though there was a change in the model code, we have referred to it in the *Comments* column as either (1) a "digit change" listing which digit changed or (2) as a "model code change." ***This year, there are 28 such vehicles where one or two digits in the Manufacturers Code were changed, but there was no significant change in the vehicle. We treated these as continuing items; the IRS treated them as new items.***

In prior years' comparative lists, because of the format limitations involved in this side-by-side presentation, some of the new item vs. continuing item differences described as "due to timing" are not purely due to timing differences. Because we (i.e., *SuperLIFO*) received the information sooner or more directly, some item categories were treated as new on an earlier compilation of new items ... and the IRS was simply catching up with treating them as new items on its "later" compilation. In some other instances, there were some "new" items where the IRS received some information on the vehicles earlier than we did, so the reverse was true.

In this year's comparative lists, information available to us for determining vehicle status was always (dated) earlier than the information the IRS was using for its determinations. This is clearly evident in the note at the bottom of page 14.

There are other instances involving models/vehicles that did not exist in the prior year where (1) we received information that the IRS did not, (2) we determined the item to be a new item, (3) the IRS did

not even list that item (because the IRS did not have any information on it) and (4) that item appears in the "No" column and is "x'd" in the "No" column. The reason that these are not considered as timing differences between our respective lists is that the IRS had no information to evaluate. Therefore, that item will not result in a timing difference until, at some later date, the IRS receives information on the vehicle and then makes its determination as to its status.

DEFINITION OF A "NEW" ITEM

A *new* item category is defined as an item category not considered to be in existence in the prior taxable year. Under Section 4.02(5) of Rev. Proc. 97-36, a new item category results from any one of the following:

- 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.

NEW ITEM: WHAT DIFFERENCE DOES IT MAKE?

New item categories are required to be included at a 1.000 factor in the annual computation of the index of inflation or deflation. This is accomplished by using the same dollar amount for the end-of-the-year base cost as for the beginning-of-the-year base cost.

Since any number divided by itself equals 1.000, this new item treatment will contribute no inflation (or deflation) *for that item* to the annual index.

However, if there is overall inflation for the year, the inclusion of the same dollar amount for that new item in both the numerator and the denominator of the fraction will *reduce* the overall weighted index result (i.e., it will depress the index computed).

The opposite result occurs in an overall deflationary year. New item treatment (at 1.000) will *increase* the overall weighted index result if there would otherwise be overall deflation for the year. ✱



COMPARISON OF "UNOFFICIAL" NEW ITEM CATEGORY LISTS

SUPERLIFO™ AND IRS / MOTOR VEHICLE TECHNICAL ADVISOR PROGRAM

NEW AUTOMOBILES AND LIGHT-DUTY TRUCKS

FOR CALENDAR YEAR DEALERS - DECEMBER 31, 2003

	LEFT-HAND COLUMN		SUPERLIFO & IRS BOTH AGREE		RIGHT-HAND COLUMN	
	SUPERLIFO SAID NEW (A)	IRS SAID NEW (B)	(A - C)	(B - D)	SUPERLIFO SAID NEW, IRS SAID CONTINUING (C)	IRS SAID NEW, SUPERLIFO SAID CONTINUING (D)
AUTOS						
Page 1	35	27	21	21	14	6
Page 2	34	30	24	24	10	6
Page 3	37	30	20	20	17	10
Page 4	40	36	31	31	9	5
Page 5	37	27	26	26	11	1
Page 6	26	49	25	25	1	24
Page 7	13	22	9	9	4	13
TOTAL AUTOS	222	221	158	156	66	65
TRUCKS						
Page 8	49	45	45	45	4	0
Page 9	54	34	34	34	20	0
Page 10	28	45	21	21	7	24
Page 11	53	52	52	52	1	0
Page 12	53	45	43	43	10	2
Page 13	43	33	25	25	18	8
Page 14	30	36	25	25	5	11
Page 15	43	35	29	29	14	6
Page 16	5	4	4	4	1	0
TOTAL TRUCKS	358	329	278	278	80	51
TOTAL AUTOS & TRUCKS	580	550	434	434	146	116

Out of the differences in Columns C & D, 23 cars and 41 truck differences were not "interpretive" differences. Rather, these 64 differences were solely due to timing in the sense that S/L and the IRS obtained the vehicle data in different time periods and therefore the vehicles did (or did not) appear on one list, but not on the other. In other words, these 64 "timing" differences would not exist if the comparison of lists were made over a 2 year period.

TIMING DIFFERENCES

IRS RECEIVED INFO EARLIER OR LATER

SUPERLIFO RECEIVED INFO EARLIER OR LATER

CARS - EARLIER 0
CARS - LATER 23

TRUCKS - EARLIER 0
TRUCKS - LATER 41

CARS - EARLIER 23
CARS - LATER 0

TRUCKS - EARLIER 41
TRUCKS - LATER 0





SUPERLIFO™ 2004 NEW ITEMS VS. IRS LISTS

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COMPARISON OF "UNOFFICIAL" NEW ITEM CATEGORY LISTS SUPERLIFO™ AND IRS MOTOR VEHICLE TECHNICAL ADVISOR PROGRAM

NEW AUTOMOBILES AND LIGHT-DUTY TRUCKS INVOLVING MANUFACTURER MODEL YEARS 2003-2004

SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS

IRS MOTOR VEHICLE TECHNICAL ADVISOR PROGRAM & (DECEMBER, 2003 CALENDAR YEAR)

LEGEND / COMMENT CODE

E =	DIFFERENCE IN ENGINE / MOST DETAILED DESCRIPTION
OP =	OPTION PACKAGES / MOST DETAILED DESCRIPTION
REGION =	DIFFERENT PRODUCT REQUIREMENTS OR OPTION PACKAGES WHICH VARY DEPENDING ON REGIONAL CONSIDERATIONS
TIMING =	TIMING DIFFERENCE: IRS RECEIVED INFO EARLIER OR LATER
DIFSC =	DIFFERENT INFORMATION SOURCES AVAILABLE TO IRS AND / OR TO SUPERLIFO™

NUMBER OF NEW ITEMS

	<u>SUPERLIFO™ CATEGORY</u>	<u>IRS CATEGORY</u>
AUTOMOBILES	<u>222</u>	<u>221</u>
LIGHT-DUTY TRUCKS	<u>358</u>	<u>329</u>
TOTAL NEW ITEM CATEGORIES	<u>580</u>	<u>550</u>

**COMPARISON OF "UNOFFICIAL" NEW ITEM CATEGORY LISTS
SUPERLIFO™ AND IRS MOTOR VEHICLE TECHNICAL ADVISOR PROGRAM**

**NEW AUTOMOBILES AND LIGHT-DUTY TRUCKS
FOR CALENDAR YEAR DEALERS - DECEMBER 31, 2003**

SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		PAGE 1 OF 16			
MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS	
		NEW AUTOMOBILES				NEW AUTOMOBILES			
ACURA	NSX-T		NA1263	X		2-DR COUPE OPEN TOP V6 AUTO	TIMING	03 MODEL 12/3/02 INTRO	
	TL		NA2163	X		2-DR COUPE OPEN TOP V6 6-SP	TIMING	03 MODEL 12/3/02 INTRO	
		4-DR SEDAN 6-SP W/HP TIRES	UA656	X					
		4-DR SEDAN 6-SP	UA655	X					
		4-DR SEDAN 6-SP W/NAV	UA655 NAV	X					
		4-DR SEDAN 6-SP W/NAV/HP TIRES	UA656 NAV	X					
		4-DR SEDAN AUTO	UA662	X					
		4-DR SEDAN AUTO W/NAV	UA662 NAV	X					
		4-DR SEDAN 6-SP	CL958	X					
	TSX	4-DR SEDAN 6-SP W/NAV	CL959	X					
		4-DR SEDAN AUTO	CL968	X					
		4-DR SEDAN AUTO W/NAV	CL969	X					
AUDI	A4 SERIES	2-DR CABRIOLET 1.8T AUTO	8H752H		X		TIMING	03 MODEL 1/1/03 INTRO	
		2-DR CABRIOLET 3.0 QUATTRO AWD AUTO	8H75FZ	X					
		4-DR SEDAN 1.8T 5-SP W/PB	8E2524 PB		X		OP		
		4-DR SEDAN 1.8T AUTO W/PB	8E252H PB		X		OP		
		4-DR SEDAN 1.8T QUATTRO 6-SP W/PB	8E2529 PB		X		OP		
		4-DR SEDAN 1.8T QUATTRO AUTO W/PB	8E252Z PB		X		OP		
		4-DR SEDAN 3.0 AUTO W/PB	8425FH PB		X		OP		
		4-DR SEDAN 3.0 QUATTRO 6-SP W/PB	8E25F9 PB		X		OP		
		4-DR SEDAN 3.0 TIP QUATTRO AUTO W/PB	8E25FZ PB		X		OP		
		4-DR WGN AVANT 1.8T QUATTRO 6-SP W/PB	8E5529 PB		X		OP		
		4-DR WGN AVANT 1.8T QUATTRO AUTO W/PB	8E552Z PB		X		OP		
		4-DR WGN AVANT QUATTRO 6-SP W/PB	8E55F9 PB		X		OP		
		4-DR WGN AVANT QUATTRO AUTO W/PB	8E55FZ PB		X		OP		
		4-DR SEDAN 2.7T QUATTRO S-LINE AUTO TIP	4B25GZ		X		DIFSC		
		A6 SERIES	4-DR SEDAN L QUATTRO AWD	4E851L		X			
		A8 SERIES	4-DR WGN 4.2 QUATTRO AWD AUTO	4B855Z		X			
		ALLROAD	4-DR SEDAN QUATTRO AWD AUTO	4B45EZ		X			
		RS 6 SERIES	4-DR SEDAN 4.2 QUATTRO AWD 6-SP	8E2549		X			
	4-DR SEDAN 4.2 QUATTRO AWD TIP		8E254L		X				
	4-DR WGN AVANT 4.2 QUATTRO AWD 6-SP		8E5549		X				
	4-DR WGN AVANT 4.2 QUATTRO AWD TIP		8E554L		X				
	TT		2-DR COUPE 3.2 QUATTRO AWD AUTO	8N35BL		X			
			2-DR ROADSTER QUATTRO AWD AUTO	8N95BL		X			
	BMW	3 SERIES		0344		X	325i 4-DR SEDAN 2.5 RWD	DIFSC	
				0335		X	325iT 4-DR SPORT WAGON 2.5 RWD	DIFSC	
				0347		X	325xi 4-DR SEDAN 2.5 AWD	DIFSC	
				0336		X	325xiT 4-DR SPORT WAGON 2.5 AWD	DIFSC	
		5 SERIES	525i 4-DR SEDAN	56		X		DIFSC	
			530i 4-DR SEDAN	50		X			





MAKE	MODEL	SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS		IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 2 OF 16 COMMENTS
		BODY STYLE	MODEL CODE	YES	NO		
BMW	5 SERIES	545i 4-DR SEDAN 6-SP	53	X			
		545iA 4-DR SEDAN AUTO	53 A	X			
	7 SERIES Z8	760Li 4-DR SEDAN	76	X			
		2-DR ROADSTER ALPINA	81	X			
CADILLAC	CTS XLR	4-DR SEDAN V	6DN69		X		
		2-DR HARDTOP CONVERTIBLE	6YV67	X		TIMING	04 INTRO 10/23/03
CHEVROLET	AVEO	4-DR SEDAN BASE W/1SB	1TD69 1SB	X			
		4-DR SEDAN LS W/1SC	1TJ69	X			
		4-DR SEDAN SPECIAL VALUE W/1SA	1TD69	X			
		5-DR SEDAN BASE W/1SB	1TD 1SB	X			
		5-DR SEDAN LS W/1SC	1TJ48	X			
		5-DR SEDAN SPECIAL VALUE W/1SA	1TD48	X			
	CAVALIER CLASSIC	2-DR COUPE W/1SV	1JC37 1SV		X		
			1ND69	X		OP	
	IMPALA	4-DR SEDAN SS	1WP19	X		DIFSC	
		4-DR SEDAN BASE	1ZS69	X			
	MALIBU	4-DR SEDAN LS	1ZT69	X			
		4-DR SEDAN LT	1ZU69	X			
	MALIBU MAXX	5-DR HATCHBACK (FLEET)	1ZS68		X		
		5-DR HATCHBACK LS	1ZT68	X		DIFSC	
	MONTE CARLO	5-DR HATCHBACK LT	1ZU68	X			
		2-DR COUPE SUPERCHARGED SS	1WZ27	X			
CHRYSLER	CROSSFIRE SEBRING	2-DR COUPE	ZHCS29	X			
		2-DR CONVERTIBLE TOURING 2.7	JRCP27	X			
		2-DR COUPE LTD 3.0	STCP22		X		
		4-DR SEDAN LTD 2.7	JRCS41	X		DIFSC	ADMIN CHANGE
		4-DR SEDAN TOURING 2.7	JRCP41	X			
			JRCH27	X		DIFSC	
			JRCH41	X		DIFSC	
DODGE	NEON STRATUS	4-DR SEDAN SRT HO TURBO	PLDS41	X			
			STDH22	X			
			STDS22	X			
						DIFSC	
FORD	CR VICTORIA	4-DR SEDAN POLICE INTERCEPTOR 730	P71 730		X		
		4-DR SEDAN POLICE INTERCEPTOR 770	P71 770		X		
	FOCUS	4-DR WAGON ZTW W/ZTEC 500	P35	X			
		5-DR HATCHBACK ZX5 SVT 010	P30		X		
	MUSTANG	2-DR CONVERTIBLE 10TH ANNIV 375	P48 375		X	DIFSC	03 MODEL
		2-DR COUPE 10TH ANNIV 325	P48 325		X	DIFSC	03 MODEL
	THUNDERBIRD		P62	X		TIMING	03 MODEL 12/2/02 INTRO
		2-DR PACIFIC COAST ROADSTER	P63		X	DIFSC	



SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)				PAGE 3 OF 16
MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
HONDA	ACCORD		CM7154	X		2-DR COUPE EX 5-SP W/CLOTH	DIFSC	5TH DIGIT CHANGE
			CM7254	X		2-DR COUPE EX AUTO W/CLOTH	DIFSC	5TH DIGIT CHANGE
			CM5584	X		4-DR SEDAN EX 5-SP W/LTHR	DIFSC	5TH DIGIT CHANGE
			CM5684	X		4-DR SEDAN EX AUTO W/LTHR	DIFSC	5TH DIGIT CHANGE
			CM5684	X		4-DR SEDAN EX AUTO W/LTHR/PZEV	DIFSC	5TH DIGIT CHANGE
		2-DR COUPE 2.4 AUTO W/CRS	CM727 CRS	X				
		2-DR COUPE 2.4 EX 5-SP W/CRS	CM717 CRS	X				
		4-DR SEDAN 2.4 EX 5-SP W/CRS	CM557 CRS	X				
		4-DR SEDAN 2.4 EX AUTO W/CRS	CM567 CRS	X				
		4-DR SEDAN 2.4 EX AUTO W/CRS/PZEV	CM567 CRSPZEV	X				
	CIVIC	2-DR COUPE VP 5-SP	EM211	X				
		2-DR COUPE VP 5-SP W/SRS	EM213	X				
		2-DR COUPE VP AUTO	EM221	X				
		2-DR COUPE VP AUTO W/SRS	EM223	X				
		4-DR SEDAN 5-SP PZEV HYBRID	ES956 PZEV	X				
		4-DR SEDAN CVT AUTO PZEV HYBRID	ES966 PZEV	X				
		4-DR SEDAN VP AUTO	ES163	X				
		4-DR SEDAN VP AUTO W/SRS	ES164	X				
HYUNDAI	ACCENT	3-DR HATCHBACK 5-SP W/SRS	13303		X		OP	
		3-DR HATCHBACK GL 5-SP W/SRS	13333		X		OP	
		3-DR HATCHBACK AUTO W/SRS	13332		X		OP	
		3-DR HATCHBACK GT 5-SP	13343	X				
		3-DR HATCHBACK GT AUTO	13342	X				
		4-DR SEDAN GL 5-SP W/SRS	13433		X		OP	
	ELANTRA	4-DR SEDAN GL AUTO W/SRS	13432		X		OP	
		5-DR HATCHBACK GT SULEV AUTO	42554		X		OP	
		4-DR SEDAN GLS SULEV AUTO	42444		X		OP	
		4-DR SEDAN GT SULEV AUTO	42454		X		OP	
	XG350		70442	X		4-DR SEDAN AUTO	DIFSC	03 MODEL
INFINITI	G35		70452	X		4-DR SEDAN L AUTO	DIFSC	03 MODEL
		4-DR SEDAN 6-SP W/LTHR	80563	X		4-DR SEDAN SPORT 6-SP W/LTHR AVAIL OP	TIMING	03 MODEL INTRO 11/4/02
			9056	X				
	Q45	4-DR SEDAN AWD AUTO W/LTHR	9061	X				
			94313	X		4-DR SEDAN LUXURY AUTO	TIMING	03 MODEL INTRO 11/15/02
			94713	X		4-DR SEDAN PREMIUM AUTO	TIMING	03 MODEL INTRO 11/15/02
JAGUAR	XJ SERIES	XJ 4-DR SEDAN VANDEN PLAS	XJ VDP	X				
		XJ8 4-DR SEDAN	XJ8	X				
		XJR 4-DR SEDAN	XJR	X				
KIA	AMANTI SPECTRA	4-DR SEDAN 3.5 V6 AUTO	82222		X		TIMING	04 MODEL 12/14/03 INTRO
		4-DR SEDAN BASE 5-SP	24401		X		DIFSC	
		4-DR SEDAN BASE AUTO	24402		X		DIFSC	
		4-DR SEDAN LS 5-SP	24441		X		DIFSC	
		4-DR SEDAN LS AUTO	24442		X		DIFSC	
		5-DR HATCHBACK GS 5-SP	24501		X		DIFSC	
		5-DR HATCHBACK GS AUTO	24502		X		DIFSC	
		5-DR HATCHBACK GSX 5-SP	24541		X		DIFSC	
		5-DR HATCHBACK GSX AUTO	24542		X		DIFSC	



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MAKE	MODEL	BODY STYLE	MODEL CODE	YES NO	BODY STYLE	COMMENT CODE	COMMENTS
LEXUS	ES330		9000	X	4-DR SEDAN AUTO	DIFSC	
LINCOLN	LS	4-DR SEDAN V6 AUTO 115	M86 115	X			
MAZDA	MAZDA 3	4-DR SEDAN 2.0 I 5-SP	MZ3 I	X			
		4-DR SEDAN 2.3 S 5-SP	MZ3 S	X			
		5-DR HATCHBACK 2.3 S 5-SP	MZ3 S5DR	X			
	MX-5 MIATA	2-DR CONVERTIBLE CLUB SPORT	MIA CS	X			03 MODEL
		2-DR CONVERTIBLE SHINSEN	MIA SH	X			03 MODEL
	RX-8	4-DR COUPE SPORT 6-SP	RX8 SP	X			
		4-DR COUPE SPORT AUTO	RX8 SA	X			
MERCEDES	C CLASS		C230	X	C230 4-DR SPORT SEDAN SUPERCHARGED	TIMING	03 MODEL INTRO 8/22/02
			C240	X	C240 4-DR SEDAN 5/MATIC AWD	DIFSC	
			C240	X	C240 4-DR WAGON 4/MATIC AWD	DIFSC	
			C320	X	C320 4-DR WAGON 4/MATIC AWD	DIFSC	
			C320 C	X			
			C320 WZ	X		DIFSC	
	CLK CLASS	C320 4-DR SPORT SEDAN 4M	C320 W4MSP	X			
		C320 4-DR SPORT SEDAN	C320 WSP	X			
		CLK320 2-DR CABRIOLET	CLK320	X		DIFSC	
		CLK500 2-DR CABRIOLET	CLK500	X			
		CLK55 AMG 2-DR CABRIOLET	CLK55	X			
		E CLASS	E320 4-DR SEDAN 4M	E320 W4M	X		
	E320 STATION WAGON AWD		E320 AWD	X		DIFSC	
	E500 4-DR SEDAN 4M		E500 W4	X		DIFSC	
	E500 STATION WAGON 4M		E500 4M	X			
	E55 AMG 4-DR SEDAN		E55	X			
	SL CLASS	SL600 2-DR COUPE	SL600	X			
		SLK230 2-DR COUPE SPEC ED	SLK230 SE	X			
	SLK CLASS	SLK320 2-DR COUPE SPEC ED	SLK320 SE	X			
MITSUBISHI	GALANT	4-DR SEDAN DE AUTO	GA41-B	X			
		4-DR SEDAN ES AUTO	GA41-G	X			
		4-DR SEDAN ES V6 AUTO	GA41-K	X			
		4-DR SEDAN GTS V6 AUTO	GA41-P	X			
	LANCER	4-DR SEDAN EVOLUTION	LE41-B	X			
		4-DR SEDAN RALLIART 5-SP	LN41-T	X			
		4-DR SEDAN RALLIART AUTO	LN41-T AUTO	X			
		4-DR SEDAN SPORTBACK RALLIART AUTO	LN45-G	X			
		4-DR SEDAN SPORTBACK RALLIART LS AUTO	LN45-B AUTO	X			
NISSAN	350Z	2-DR ROADSTER ENTHUSIAST 6-SP	5686	X			
		2-DR ROADSTER ENTHUSIAST AUTO	5681	X			
		2-DR ROADSTER TOURING 5-SP	5676	X			
		2-DR ROADSTER TOURING AUTO	5671	X			
	ALTIMA	4-DR SEDAN 2.5 5-SP CA	0515	X		REG	
		4-DR SEDAN 2.5 AUTO CA	0511	X		REG	
		4-DR SEDAN 2.5 S 5-SP CA	0525	X		REG	
		4-DR SEDAN 2.5 S AUTO CA	0521	X		REG	



SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 5 OF 16 COMMENTS
MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	
NISSAN	ALTIMA MAXIMA	4-DR SEDAN 2.5 SL AUTO CA	0531		X		REG DIFSC DIFSC
		4-DR SEDAN 3.5 SE 5-SP	0826		X		
		4-DR SEDAN 3.5 SE AUTO	0821		X		
		4-DR SEDAN 3.5 SL AUTO	0861	X			
	SENTRA	4-DR SEDAN SE-R AUTO CA	4291		X		REG REG
		4-DR SEDAN 2.5S AUTO CA	4261		X		
PONTIAC	BONNEVILLE GRAND PRIX	4-DR SEDAN GXP	2HZ69	X			DIFSC DIFSC
		4-DR SEDAN GT1	2WP69		X		
		4-DR SEDAN GT2	2WS69	X			
		4-DR SEDAN GTP	2WR69		X		
	GTO SUNFIRE	2-DR COUPE	2VX37	X			DIFSC
		2-DR COUPE W/1SV	2JB37 1SV	X			
PORSCHÉ	CARRERA	CARR 2-DR CABRIOLET C4S	996330		X		DIFSC DIFSC
		CARR 2-DR CABRIOLET TURBO	996620		X		
ROLLS ROYCE	ROLLS ROYCE	PHANTOM 4-DR SEDAN	ROLLS RRPH		X		DIFSC
SAAB	9.3 SERIES	2-DR CONVERTIBLE 2.0 AERO	352 AERO	X			
		2-DR CONVERTIBLE 2.0 ARC	342		X		
		4-DR SPORT SEDAN 2.0 AERO	354		X		
	9.5 SERIES	4-DR SEDAN 2.3 ARC	554		X		
		5-DR WAGON 2.3 ARC	555		X		
SATURN	ION 2	2-DR QUAD COUPE 5-SP	ZAM37	X			
		2-DR QUAD COUPE AUTO	ZAN37		X		
	ION 3	2-DR QUAD COUPE 5-SP	ZAV37		X		
		2-DR QUAD COUPE AUTO	ZAW37		X		
	L300	4-DR SEDAN 2.2 AUTO	ZJC19		X		
		4-DR WAGON 2.2 AUTO	ZJC35		X		
		4-DR SEDAN V6 3.0 AUTO	ZJD19		X		
		4-DR WAGON V6 3.0 AUTO	ZJD35		X		
		4-DR SEDAN V6 3.0 AUTO	ZJL19		X		
		4-DR WAGON V6 3.0 AUTO	ZJL35		X		
SCION	XA	5-DR HATCHBACK 5-SP	6211		X		
		5-DR HATCHBACK AUTO	6210		X		
	XB	5-DR WAGON 5-SP	6201		X		
		5-DR WAGON AUTO	6200		X		
SUBARU	IMPREZA	4-DR SEDAN WRX STI W/GOLD WHEELS	4JE		X	4-DR SEDAN WRX AWD W/PREM PKG	DIFSC
		4-DR SEDAN WRX STI W/SILVER WHEELS	J1		X		
			JJ		X		
	LEGACY	5-DR WAGON OUTBACK H6 3.0 AWD	BX		X		OP

SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		PAGE 6 OF 16	
MAKE	MODEL	BODY STYLE	MODEL CODE	YES NO	BODY STYLE	COMMENT CODE	COMMENTS
SUZUKI	AERIO		STL8GT4	X	4-DR SEDAN S FWD AUTO	DIFSC	5TH DIGIT CHANGE
			STL8FQ4	X	4-DR SEDAN LX FWD 5-SP	DIFSC	5TH DIGIT CHANGE
			STL8GQ4	X	4-DR SEDAN LX FWD AUTO	DIFSC	5TH DIGIT CHANGE
			STL8JQ4	X	4-DR SEDAN LX AWD AUTO	DIFSC	5TH DIGIT CHANGE
			WTN8GQ4	X	4-DR WAGON SX FWD AUTO	DIFSC	5TH DIGIT CHANGE
			WTN8JQ4	X	4-DR WAGON SX AWD AUTO	DIFSC	5TH DIGIT CHANGE
	FORENZA	4-DR SEDAN EX AUTO	X4XQ4C	X			
		4-DR SEDAN LX 5-SP	X4XQ5A	X			
		4-DR SEDAN LX AUTO	X4XQ4A	X			
		4-DR SEDAN S 5-SP	X4MQ5A	X			
	VERONA	4-DR SEDAN S AUTO	X4MQ4A	X			
		4-DR SEDAN EX AUTO	W4CY4C	X			
		4-DR SEDAN EX AUTO W/TRAC	W4CY4D	X		OP	
		4-DR SEDAN LX AUTO	W4XY4B	X			
		4-DR SEDAN S AUTO	W4XY4A	X			
TOYOTA	CAMRY		2552	X	4-DR SEDAN LE V6 AUTO	TIMING	03 MODEL 12/1/02 INTRO
			2556	X	4-DR SEDAN SE V6 AUTO	TIMING	03 MODEL 12/1/02 INTRO
			2554	X	4-DR SEDAN XLE V6 AUTO	TIMING	03 MODEL 12/1/02 INTRO
			2550	X	4-DR SEDAN SE V6 AUTO	DIFSC	04 MODEL
	CAMRY SOLARA	2-DR COUPE L4 SE 5-SP	2739	X			
		2-DR COUPE L4 SE AUTO	2736	X			
		2-DR COUPE L4 SLE AUTO	2740	X			
		2-DR COUPE L4 SPORT 5-SP	2749	X			
		2-DR COUPE L4 SPORT AUTO	2746	X			
		2-DR COUPE SE V6 AUTO	2738	X			
		2-DR COUPE SLE V6 AUTO	2742	X			
		2-DR COUPE SPORT V6 AUTO	2748	X			
	CELICA	2-DR LIFTBACK GT 5-SP W/ACT PKG	2125	X			
		2-DR LIFTBACK GT AUTO W/ACT PKG	2126	X			
		2-DR LIFTBACK GTS 6-SP W/ACT PKG	2135	X			
		2-DR LIFTBACK GTS AUTO W/ACT PKG	2136	X			
	PRIUS	4-DR SEDAN AUTO	1224	X			
VOLKSWAGEN	GOLF		9B1434	X	4-DR HATCHBACK GL TDI 5-SP	DIFSC	4TH/5TH DIGIT CHANGE
			9B1438	X	4-DR HATCHBACK GL TDI AUTO	DIFSC	4TH/5TH DIGIT CHANGE
			9B1534	X	4-DR HATCHBACK GLS TDI 5-SP	DIFSC	4TH/5TH DIGIT CHANGE
			9B1538	X	4-DR HATCHBACK GLS TDI AUTO	DIFSC	4TH/5TH DIGIT CHANGE
			9B1JN6	X	2-DR HATCHBACK 6-SP ANNIV ED	DIFSC	03 MODEL
			9M24C4	X			
	GTI JETTA	4-DR SEDAN GL 2.0 5-SP PZEV CA/NE	9M24C3	X			
		4-DR SEDAN GL 2.0 AUTO PZEV CA/NE	9M25C4	X			
		4-DR SEDAN GLS 2.0 5-SP PZEV CA/NE	9M25C3	X			
		4-DR SEDAN GLS 2.0 AUTO PZEV CA/NE	9M2434	X	4-DR SEDAN GL TDI 5-SP	DIFSC	5TH DIGIT CHANGE
			9M2438	X	4-DR SEDAN GL TDI TIP	DIFSC	5TH/6TH DIGIT CHANGE
			1J6434	X	4-DR WAGON GL TDI 5-SP	DIFSC	5TH DIGIT CHANGE
			1J6438	X	4-DR WAGON GL TDI TIP	DIFSC	5TH/6TH DIGIT CHANGE
			9M2534	X	4-DR SEDAN GLS TDI 5-SP	DIFSC	5TH DIGIT CHANGE
			9M2538	X	4-DR SEDAN GLS TDI TIP	DIFSC	5TH/6TH DIGIT CHANGE
			1J6534	X	4-DR WAGON GLS TDI 5-SP	DIFSC	5TH DIGIT CHANGE
			1J6538	X	4-DR WAGON GLS TDI TIP	DIFSC	5TH/6TH DIGIT CHANGE
			9M2WN4	X	4-DR SEDAN WOLFBURG ED 5-SP	TIMING	03 MODEL 8/15/02 INTRQ





MAKE	MODEL	SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS		IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 7 OF 16	
		BODY STYLE	MODEL CODE	YES NO	BODY STYLE		COMMENTS	
VOLKSWAGEN	JETTA		9M2WN8	X	4-DR SEDAN WOLFSBURG ED AUTO	TIMING	03 MODEL 8/15/02 INTRO	
			1Y74G4	X	2-DR CONVERTIBLE GL 5-SP	TIMING	03 MODEL 11/1/02 INTRO	
	NEW BEETLE		1Y74GA	X	2-DR CONVERTIBLE GL TIP	TIMING	03 MODEL 11/1/02 INTRO	
			1Y75N4	X	2-DR CONVERTIBLE GLS 5-SP	TIMING	03 MODEL 11/1/02 INTRO	
			1Y75NA	X	2-DR CONVERTIBLE GLS TIP	TIMING	03 MODEL 11/1/02 INTRO	
			1Y76N4	X	2-DR CONVERTIBLE GLX 5-SP	TIMING	03 MODEL 11/1/02 INTRO	
			1Y76NA	X	2-DR CONVERTIBLE GLX TIP	TIMING	03 MODEL 11/1/02 INTRO	
			1C1434	X	3-DR HATCHBACK GL TDI 5-SP	DIFSC	5TH DIGIT CHANGE	
			1C143A	X	3-DR HATCHBACK GL TDI AUTO	DIFSC	5TH/6TH DIGIT CHANGE	
			1C1534	X	3-DR HATCHBACK GLS TDI 5-SP	DIFSC	5TH DIGIT CHANGE	
			1C153A	X	3-DR HATCHBACK GLS TDI AUTO	DIFSC	5TH/6TH DIGIT CHANGE	
			3B38V8	X	4-DR SEDAN W8 4MOTION 6-SP	TIMING	03 MODEL 8/15/02 INTRO	
			3B68V8	X	5-DR WAGON W8 4MOTION 6-SP	TIMING	03 MODEL 8/15/02 INTRO	
		PASSAT		3D85FA	X			
				3D86FA	X			
				3D86H9	X			
				3D85H9	X			
		PHAETON	4-DR SEDAN V8 5 PASS AUTO	3D85FA	X			
	4-DR SEDAN V8 4 PASS AUTO		3D86FA	X				
	4-DR SEDAN W12 4 PASS AUTO		3D86H9	X				
4-DR SEDAN W12 5 PASS AUTO	3D85H9		X					
VOLVO	40 SERIES	S40 4-DR SEDAN LSE SR AUTO	S40 LSEASR	X				
		V40 4-DR SEDAN LSE SR AUTO	V40 LSEASR	X				
	60 SERIES	S60 4-DR SEDAN 2.5T AUTO	S60 2.5TA		X	DIFSC		
		S60 4-DR SEDAN R 5-SP	S60 RM		X	DIFSC		
	70 SERIES	V70 5-DR WAGON 2.5T AUTO	V70 2.5TA		X	DIFSC		
		V70 5-DR WAGON R 5-SP	V70 RM	X				
	80 SERIES	S80 4-DR SEDAN 2.5T	S80 2.5TA	X				
		S80 4-DR SEDAN 2.5T AWD AUTO	S80 2.5TAWDA	X				
		S80 4-DR SEDAN T6 PREMIER	S80 T6PREMIE		X	DIFSC		

MAKE	MODEL	SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS		IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 8 OF 16 COMMENTS
		BODY STYLE	MODEL CODE	YES	NO		
		NEW LIGHT DUTY TRUCKS					
BMW	X3	4-DR SUV 3.0i	65		X	TIMING	04 MODEL 11/1/03 INTRO
BUICK	RAINIER	2WD SPORT UTILITY CXL	BS15506	X			
		2WD SPORT UTILITY CXL PLUS	BS15506 PLUS	X			
		AWD SPORT UTILITY CXL	BT15506	X			
	RENDEZVOUS	AWD SPORT UTILITY CXL PLUS	BT15506 PLUS	X			
		AWD SPORT UTILITY ULTRA	4BT26 ULTRA	X			
		2WD SPORT UTILITY CXL	4BK26 CXL		X	TIMING	04 MODEL 10/27/03 INTRO
		AWD SPORT UTILITY CXL	4BT26 CXL		X	TIMING	04 MODEL 10/27/03 INTRO
CADILLAC	SRX	4-DR SPORT UTILITY V6	6EB26	X			
		4-DR SPORT UTILITY V8	6ED26	X			
CHEVROLET	COLORADO	2WD CREW CAB LS Z71 W/1SE	CS15643 LS1SE	X			
		2WD CREW CAB LS Z71 W/1SF	CS15643 LS1SF	X			
		2WD CREW CAB LS Z85 W/1SB	CS15643 LS1SB	X			
		2WD CREW CAB LS ZQ8 W/1SH	CS15643 LS1SH	X			
		2WD CREW CAB LS ZQ8 W/1SJ	CS15643 LS1SJ	X			
		2WD CREW CAB LS Z85 W/1SC	CS15643 LS 1S	X			
		2WD EXT CAB LS Z71	CS15653 Z71LS	X			
		2WD EXT CAB LS Z85	CS15643 Z85LS	X			
		2WD EXT CAB LS ZQ8	CS15653 ZQ8LS	X			
		2WD EXT CAB Z71	CS15643 Z71	X			
		2WD EXT CAB Z85	CS15653 Z85	X			
		2WD EXT CAB Z85 FLEET	CS15653 FLEET	X			
		2WD EXT CAB ZQ8	CS15653 ZQ8	X			
		2WD REG CAB LS Z71	CS15403 Z71LS	X			
		2WD REG CAB LS Z85	CS15403 LS	X			
		2WD REG CAB LS ZQ8	CS15403 ZQ8LS	X			
		2WD REG CAB Z71	CS15403 Z71	X			
		2WD REG CAB Z85	CS15403 Z85	X			
		2WD REG CAB Z85 FLEET	CS15403 FLEET	X			
		2WD REG CAB ZQ8	CS15403 ZQ8	X			
		4WD CREW CAB LS Z71 W/1SE	CT15643 LS1SE	X			
		4WD CREW CAB LS Z71 W/1SF	CT15643 LS1SF	X			
		4WD CREW CAB LS Z85 W/1SB	CT15643 LS1SB	X			
		4WD CREW CAB LS Z85 W/1SC	CT15643 LS1SC	X			
		4WD EXT CAB LS Z71	CT15653 Z71LS	X			
		4WD EXT CAB LS Z85	CT15653 Z85LS	X			
		4WD EXT CAB Z71	CT15653 Z71	X			
		4WD EXT CAB Z85	CT15653 Z85	X			
		4WD REG CAB LS Z71	CT15403 Z71LS	X			
		4WD REG CAB LS Z85	CT15403 Z85LS	X			
		4WD REG CAB Z71	CT15403 Z71	X			
		4WD REG CAB Z85	CT15403 Z85	X			
	EXPRESS CARGO SILVERADO 1500	EXT WORK VAN HD 6CP	CG23705 HD		X	DIFSC	
		2WD EXT CAB WT	CC15753 WT	X			
		2WD EXT CAB WT	CC15903 WT	X			
		2WD REG CAB WT	CC15703 WT	X			
		2WD REG CAB WT	CC15903 WT	X			
		4WD EXT CAB WT	CK15753 WT	X			
		4WD EXT CAB WT	CK15953 WT	X			



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MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
CHEVROLET	SILVERADO 1500	4WD EXT CAB Z71	CK15753 Z71	X				
		4WD EXT CAB Z71	CK15953 Z71	X				
		4WD REG CAB WT	CK15703 WT	X				
		4WD REG CAB WT	CK15903 WT	X				
		4WD REG CAB Z71	CK15703 Z71	X				
	SILVERADO 2500	4WD REG CAB Z71	CK15903 Z71	X				
		2WD CREW CAB LD LS	CC25743 LDLS	X				
		2WD CREW CAB LD LT	CC25743 LT	X				
		2WD REG CAB LD WT	CC25903 LDWT	X				
		4WD CREW CAB LD LS	CK25743 LDLS	X				
	SILVERADO 2500 HD	4WD CREW CAB LD LT	CK25743 LT	X				
		4WD EXT CAB LD WT	CK25753 LDWT	X				
		2WD CREW CAB WT HD	CC25743 HDWT	X				
		2WD CREW CAB WT HD	CC25943 HDWT	X				
		2WD EXT CAB WT HD	CC25753 HDWT	X				
		2WD EXT CAB WT HD	CC25953 HDWT	X				
		2WD REG CAB WT HD	CC25903 HDWT	X				
		4WD CREW CAB WT HD	CK25743 HDWT	X				
		4WD CREW CAB WT HD	CK25943 HDWT	X				
		4WD EXT CAB WT HD	CK25753 HDWT	X				
	SILVERADO 3500	4WD EXT CAB WT HD	CK25953 HDWT	X				
		4WD REG CAB WT HD	CK25903 HDWT	X				
		2WD CREW CAB WT	CC35943 WT	X				
		2WD EXT CAB WT	CC35953 WT	X				
		2WD REG CAB WT	CK35903 WT	X				
		4WD CREW CAB LS SRW	CK35943 LSSRW	X			DIFSC	
		4WD CREW CAB LT SRW	CK35943 LTSRW	X			DIFSC	
		4WD CREW CAB SRW	CK35943 SRW	X			DIFSC	
		4WD CREW CAB WT	CK35943 WT	X				
		4WD CREW CAB WT SRW	CK35943 WTSRW	X			DIFSC	
	SILVERADO 3500 CHASSIS CABS	4WD EXT CAB LS SRW	CK35953 LSSRW	X			DIFSC	
		4WD EXT CAB LT SRW	CK35953 LTSRW	X			DIFSC	
		4WD EXT CAB SRW	CK35953 SRW	X			DIFSC	
		4WD EXT CAB WT	CK35953 WT	X			DIFSC	
		4WD EXT CAB WT SRW	CK35903 WTSRW	X			DIFSC	
		4WD REG CAB LS SRW	CK35903 LSSRW	X			DIFSC	
		4WD REG CAB SRW	CK35903 SRW	X			DIFSC	
		4WD REG CAB WT SRW	CK35903 WTSRW	X			DIFSC	
		EXT CAB 2WD WT	CC36053 WT	X			DIFSC	
		EXT CAB 4WD WT	CK36053 WT	X			DIFSC	
	SSR TRAILBLAZER	REG CAB 2WD WT	CC36003 WT	X			DIFSC	
		REG CAB 2WD WT	CC36403 WT	X			DIFSC	
		REG CAB 4WD WT	CK36003 WT	X			DIFSC	
		REG CAB 4WD WT	CK36403 WT	X			DIFSC	
		2-DR CONVERTIBLE REG CAB	CS15703	X				
CHRYSLER	VENTURE	4-DR 2WD SPORT UTILITY EXT LS	CS15806 LS	X				
		4-DR 4WD SPORT UTILITY EXT LS	CT15806 LS	X				
		4-DR PASS LT ENTERTAINER 1SG	1UT16 LTE	X			DIFSC	
	PACIFICA	5-DR SPORT WAGON AWD	CSCS74	X				
		5-DR SPORT WAGON FWD	CSYS74	X				
	TOWN & COUNTRY	5-DR WAGON 2WD	RSYL53	X				03 MODEL
		5-DR WAGON 2WD	RSYH52	X				
		5-DR WAGON TOURING AWD	RSCP53	X			DIFSC	
		5-DR WAGON TOURING FWD	RSYP53	X			DIFSC	



SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)			PAGE 10 OF 16	
MAKE	MODEL	BODY STYLE	MODEL CODE	YES NO	BODY STYLE	COMMENT CODE	COMMENTS	
DODGE	CARAVAN		RSKL12	X	CARAVAN 4-DR CARGO VAN V6	TIMING	03 MODEL INTRO 10/14/02	
			RSKL13	X	GRAND CARAVAN 4-DR CARGO VAN V6	TIMING	03 MODEL INTRO 10/14/02	
		CARAVAN SXT FLEET	RSKH52	X		DIFSC		
	DURANGO	GRAND CARAVAN SXT	RSKH53	X		DIFSC		
		GRAND CARAVAN SXT AWD	RSDH53	X		DIFSC		
		4-DR 2WD SPORT UTILITY	HB1M74	X		DIFSC		
		4-DR 2WD SPORT UTILITY LTD	HB1P74	X				
		4-DR 2WD SPORT UTILITY SLT	HB1H74	X				
		4-DR 4WD SPORT UTILITY	HB5M74	X				
		4-DR 4WD SPORT UTILITY LTD	HB5P74	X				
	SPRINTER	4-DR 4WD SPORT UTILITY SLT	HB5H74	X				
		2500 HC CARGO VAN TURBO 118	VA2L11	X			03 MODEL	
		2500 HC CARGO VAN TURBO 140	VA2L12	X			03 MODEL	
		2500 HC WAGON TURBO 118	VA2L51	X			03 MODEL	
		2500 HC WAGON TURBO 140	VA2L52	X			03 MODEL	
		2500 SUPER HC CARGO VAN TURBO 118	VA2L14	X			03 MODEL	
		2500 SUPER HC CARGO VAN TURBO 140	VA2L15	X			03 MODEL	
		2500 SUPER HC CARGO VAN TURBO 158	VA2L16	X			03 MODEL	
		2500 SUPER HC WAGON TURBO 118	VA2L54	X			03 MODEL	
		2500 SUPER HC WAGON TURBO 140	VA2L55	X			03 MODEL	
		2500 SUPER HC WAGON TURBO 158	VA2L56	X			03 MODEL	
		3500 HC CARGO VAN TURBO 140	VA3L12	X			03 MODEL	
		3500 SUPER HC VAN TURBO 140	VA3L15	X			03 MODEL	
		3500 SUPER HC CARGO VAN TURBO 158	VA3L16	X			03 MODEL	
FORD	E-SERIES	E150 3-DR WAGON CHATEAU	E11 CH	X				
		E350 SUPER DUTY WAGON CHATEAU	E31 CH	X				
	EXCURSION		U40/800	X	2WD 5-DR SPORT UTILITY LIMO XLT	TIMING	03 MODEL 12/26/02 INTRO	
			U42/351A	X	2WD 5-DR SPORT UTILITY LIMITED			
	EXPEDITION	4-DR 2WD XLS 4.6 100	U13 100	X		DIFSC		
		4-DR 2WD XLS 4.6 200	U14 200	X		DIFSC		
	EXPLORER	4X2 WGN SPORT TRAC ADRENALIN 140	U67 140	X		TIMING	04 MODEL 10/1/03 INTRO	
		4X4 WGN SPORT TRAC ADRENALIN 240	U77 240	X		TIMING	04 MODEL 10/1/03 INTRO	
	SPORT F150 HERITAGE		F17	X	2-DR 2WD REG CAB S/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F07	X	2-DR 2WD REG CAB F/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F17	X	2-DR 2WD REG CAB S/S XL LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F18	X	2-DR 4WD REG CAB S/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F08	X	2-DR 4WD REG CAB F/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F18	X	2-DR 4WD REG CAB S/S XL LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F17	X	2-DR 2WD REG CAB S/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F07	X	2-DR 2WD REG CAB F/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F17	X	2-DR 2WD REG CAB S/S XLT LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F18	X	2-DR 4WD REG CAB S/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F08	X	2-DR 4WD REG CAB F/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			F18	X	2-DR 4WD REG CAB S/S XLT LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X17	X	4-DR 2WD SUPER CAB S/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X17	X	4-DR 2WD SUPER CAB S/S XL LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X18	X	4-DR 4WD SUPER CAB S/S XL SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X18	X	4-DR 4WD SUPER CAB S/S XL LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X17	X	4-DR 2WD SUPER CAB S/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X17	X	4-DR 2WD SUPER CAB S/S XLT LWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X18	X	4-DR 4WD SUPER CAB S/S XLT SWB	DIFSC	RENAMED WAS F150 PU FOR 03	
			X18	X	4-DR 4WD SUPER CAB S/S XLT LWB	DIFSC	RENAMED WAS F150 PU FOR 03	



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MAKE	MODEL	BODY STYLE	MODEL CODE	YES NO	BODY STYLE	COMMENT CODE	COMMENTS
FORD	F150 PICKUP	2WD REG CAB F/S STX 126WB	F02 STXSWB	X			
		2WD REG CAB F/S XLT 126WB	F02 XLTSWB	X			
		2WD REG CAB STX 126WB	F12 STXSWB	X			
		2WD REG CAB XL 126WB	F12 XLSWB	X			
		2WD REG CAB XL 145WB	F12 XLLWB	X			
		2WD REG CAB XLT 126WB	F12 XLTSWB	X			
		2WD REG CAB XLT 145WB	F12 XLT	X			
		2WD SUPERCAB F/S STX 145WB	X02 STX	X			
		2WD SUPERCAB F/S XLT 145WB	X02 XLT	X			
		2WD SUPERCAB LARIAT 133WB	X12 LARSWB	X			
		2WD SUPERCAB LARIAT 145WB	X12 LARLWB	X			
		2WD SUPERCAB STX 133WB	X12 STXSWB	X			
		2WD SUPERCAB STX 145WB	X12 STXLWB	X			
		2WD SUPERCAB XL 145WB	X12 XLSWB	X			
		2WD SUPERCAB XL 163WB	X12 XLLWB	X			
		2WD SUPERCAB XLT 133WB	X12 XLTSWB	X			
		2WD SUPERCAB XLT 145WB	X12 XLTLWB	X			
		2WD SUPERCAB XLT 163WB	X12 XLT163	X			
		2WD SUPERCREW LARIAT 139WB	W12 LAR	X			
		2WD SUPERCREW XLT 139WB	W12 XLT	X			
		4WD REG CAB F/S FX4 126WB	F04 FX4	X			
		4WD REG CAB F/S STX 126WB	F04 STXSWB	X			
		4WD REG CAB F/S XLT 126WB	F04 XLT	X			
		4WD REG CAB FX4 126WB	F14 FX4	X			
		4WD REG CAB STX 126WB	F14 STXSWB	X			
		4WD REG CAB XL 126WB	F14 XLSWB	X			
		4WD REG CAB XL 145WB	F14 XLLWB	X			
		4WD REG CAB XLT 126WB	F14 XLTSWB	X			
		4WD REG CAB XLT 145WB	F14 XLTLWB	X			
		4WD SUPERCAB F/S FX4 145WB	X04 FX4	X			
		4WD SUPERCAB F/S STX 145WB	X04 STX	X			
		4WD SUPERCAB F/S XLT 145WB	X04 XLT	X			
		4WD SUPERCAB FX4 133WB	X14 FX4SWB	X			
		4WD SUPERCAB FX4 145WB	X14 FX4LWB	X			
		4WD SUPERCAB LARIAT 133WB	X14 LARSWB	X			
		4WD SUPERCAB LARIAT 145WB	X14 LARLWB	X			
		4WD SUPERCAB STX 133WB	X14 STXSWB	X			
		4WD SUPERCAB STX 145WB	X14 STXLWB	X			
		4WD SUPERCAB XL 145WB	X14 XLSWB	X			
		4WD SUPERCAB XL 163WB	X14 XLLWB	X			
		4WD SUPERCAB XLT 133WB	X14 XLT133	X			
		4WD SUPERCAB XLT 145WB	X14 XLT145	X			
		4WD SUPERCAB XLT 163WB	X14 XLT163	X			
		4WD SUPERCREW FX4 139WB	W14 FX4	X			
		4WD SUPERCREW LARIAT 139WB	W14 LAR	X			
		4WD SUPERCREW XLT 139WB	W14 XLT	X			
	FREESTAR	4-DR CARGO VAN 800	A54	X			
		4-DR WAGON LT 300	A58	X			
		4-DR WAGON S 110	A50	X			
		4-DR WAGON SE 120	A51	X			
	RANGER	4-DR WAGON SEL 120	A52	X			
		4-DR WAGON SES 130	A57	X			
		4-DR 4WD SUPERCAB TREMOR 459	R45 T459	X			
						DIFSC	



SUPERLIFT™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 12 OF 16 COMMENTS
MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO		
GMC	CANYON	2WD CREW CAB SLE Z71 W/1SE	TS15643 SLE1SE	X			
		2WD CREW CAB SLE Z71 W/1SF	TS15643 SLE1SF	X			
		2WD CREW CAB SLE Z85 W/1SB	TS15643 SLE1SB	X			
		2WD CREW CAB SLE Z85 W/1SC	TS15643 SLE1SC	X			
		2WD EXT CAB BASE Z71	TS15643 Z71	X			
		2WD EXT CAB BASE Z85	TS15653 X85	X			
		2WD EXT CAB SLE Z71	TS25653 SLEZ1	X			
		2WD EXT CAB SLE Z85	TS15653 ZLEZ85	X			
		2WD EXT CAB Z85 FLEET	TS 15653 Z85FL	X			
		2WD REG CAB BASE SL Z71	TS 15403 SLZ71	X			
		2WD REG CAB BASE SL Z85	TS15403 SLZ85	X			
		2WD REG CAB BASE SL Z85 FLEET	TS15403 SLZ85FL	X			
		2WD REG CAB SLE Z71	TS 15403 SLEZ71	X			
		2WD REG CAB SLE Z85	TS15403 SLEZ85	X			
		4WD CREW CAB SLE Z71 W/1SE	TT15643 SLE1SE	X			
		4WD CREW CAB SLE Z71 W/1SF	TT15643 SLE1SF	X			
		4WD CREW CAB SLE Z85 W/1SB	TT15643 SLE1SB	X			
		4WD CREW CAB SLE Z85 W/1SC	TT15643 SLE1SC	X			
		4WD EXT CAB BASE Z71	TT15643 Z71	X			
		4WD EXT CAB BASE Z85	TT15653 Z85	X			
		4WD EXT CAB SLE Z71	TT15653 SLEZ71	X			
		4WD EXT CAB SLE Z85	TT15643 SLEZ85	X			
		4WD REG CAB BASE SL Z71	TT15403 SLZ71	X			
		4WD REG CAB BASE SL Z85	TT15403 SLZ85	X			
		4WD REG CAB SLE Z71	TT15403 ZLEZ71	X			
		4WD REG CAB SLE Z85	TT15403 SLEZ85	X			
	ENVOY XUV	2WD 4-DR SLE	TS15836	X			
		2WD 4-DR SLT	TS15836 SLT	X			
		4WD 4-DR SLE	TT15836	X			
	SAVANA CARGO VAN	CARGO VAN HD	TG33405		X		DIFSC
		CARGO WORK VAN	TG13405 WV		X		DIFSC
		CARGO WORK VAN HD	TG23405 HD		X		DIFSC
		EXT CARGO WORK VAN	TG23405 WV		X		DIFSC
	SIERRA 3500 CHASSIS-CABS	2WD 3500 EXT CAB CHASSIS WT PKG SWB	TC36053 WT		X		DIFSC
		2WD 3500 REG CAB CHASSIS WT PKG LWB	TC36403 WT		X		DIFSC
		2WD 3500 REG CAB CHASSIS WT PKG SWB	TC36003 WT		X		DIFSC
		4WD 3500 EXT CAB CHASSIS WT PKG LWB	TK36053 WT		X		DIFSC
		4WD 3500 REG CAB CHASSIS WT PKG LWB	TK36403 WT		X		DIFSC
		4WD REG CAB CHASSIS WT PKG SWB	TK36003 WT		X		DIFSC
	SIERRA HEAVY DUTY PICKUP	2WD 2500 CREW CAB WT PKG H/D	TC25943 WTHD	X			
		2WD 2500 CREW CAB WT PKG SWB H/D	TC25743 WTHD	X			
		2WD 4-DR 2500 EXT CAB WT PKG LWB H/D	TC25953 WTHD	X			
		2WD 4-DR 2500 EXT CAB WT PKG LWB H/D	TC25753 WTHD	X			
		4WD 2500 CREW CAB WT PKG LWB H/D	TK25943 WTHD	X			
		4WD 2500 CREW CAB WT PKG SWB H/D	TK25743 WTHD	X			
		4WD 4-DR 2500 EXT CAB WT PKG LWB H/D	TK25953 WTHD	X			
		4WD 4-DR 2500 EXTCAB WT PKG SWB H/D	TK25753 H/D	X			
	SIERRA PICKUP	2WD 1500 EXT CAB WT PKG LWB	TC15953 WT	X			
		2WD 1500 REG CAB WT PKG SWB	TC15703 WT	X			
		2WD 2500 CREW CAB SLE	TC25743 SLE	X			
		2WD 2500 CREW CAB SLT SWB	TC25743 SLT	X			
			TC25903	X			
			TC25903	X			
		2WD 3500 CREW CAB WT PKG	TC35943 WT	X			
		2WD 3500 EXT CAB WT	TC35953 WT	X			
						4WD 4-DR 2500 REG CAB	DIFSC
						4WD 4-DR 2500 REG CAB SLE	DIFSC



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MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	COMMENT CODE	COMMENTS
GMC	SIERRA PICKUP	2WD 3500 EXT CAB WT PKG LWB	TK35953 WT	X			
		4WD 1500 EXT CAB WT PKG LWB	TK15953 WT	X			
		4WD 1500 EXT CAB WT PKG SWB	TK15753 WT	X			
		4WD 1500 REG CAB WT PKG SWB	TK15703 WT	X			
		4WD 2500 CREW CAB SLT	TK25743 SLT	X			
		4WD 2500 CREW CAB SLE SWB	TK25743 SLE	X			
		4WD 2500 EXT CAB WT PKG SWB	TK25753 WT	X			
		4WD 3500 CREW CAB SRW	TK35943 SRW		X		DIFSC
		4WD 3500 CREW CAB SRW SLE	TK35943 SRWSLE		X		DIFSC
		4WD 3500 CREW CAB SRW SLT	TK35943 SRWSLT		X		DIFSC
		4WD 3500 CREW CAB WT PKG LWB	TK35943 WT	X			
		4WD 3500 EXT CAB SRW	TK35953 SRW		X		DIFSC
		4WD 3500 EXT CAB SRW SLE	TK35953 SRWSLE		X		DIFSC
		4WD 3500 EXT CAB SRW SLT	TK35903 SRWSLT		X		DIFSC
		4WD 3500 EXT CAB SRW WT PKG	TK35943 SRWWT		X		DIFSC
		4WD 3500 EXT CAB SRW WT PKG	TK35953 SRWWT		X		DIFSC
		4WD 3500 REG CAB SRW	TK35903 SRW		X		DIFSC
		4WD 3500 REG CAB SRW SLE	TK35903 SRWSLE		X		DIFSC
		4WD 3500 REG CAB SRW WT PKG	TK35903 SRWWT		X		DIFSC
		4WD 3500 REG CAB WT PKG LWB	TK350903	X			
HONDA	ELEMENT		YH1723	X		2WD 4-DR SPORT UTILITY DX 5-SP	TIMING 03 MODEL 12/9/02 INTRO
			YH1823	X		2WD 4-DR SPORT UTILITY DX AUTO	TIMING 03 MODEL 12/9/02 INTRO
			YH2823	X		4WD 4-DR SPORT UTILITY DX AUTO	TIMING 03 MODEL 12/9/02 INTRO
			YH1753	X		2WD 4-DR SPORT UTILITY EX 5-SP	TIMING 03 MODEL 12/9/02 INTRO
			YH1853	X		2WD 4-DR SPORT UTILITY EX AUTO	TIMING 03 MODEL 12/9/02 INTRO
			YH2853	X		4WD 4-DR SPORT UTILITY EX AUTO	TIMING 03 MODEL 12/9/02 INTRO
		2WD 5-DR EX 5-SP W/SRS	YH176	X			
		2WD 5-DR EX AUTO W/SRS	YH186	X			
		2WD 5-DR LX 5-SP	YH173		X		
		2WD 5-DR LX AUTO	YH173		X		TIMING 04 MODEL 12/9/03 INTRO
		4WD 5-DR DX 5-SP	YH272	X			TIMING 04 MODEL 12/9/03 INTRO
		4WD 5-DR EX 5-SP	YH275	X			
		4WD 5-DR EX 5-SP W/SRS	YH276	X			
		4WD 5-DR EX AUTO W/SRS	YH286	X			
		4WD 5-DR LX 5-SP	YH273		X		TIMING 04 MODEL 12/9/03 INTRO
		4WD 5-DR LX AUTO	YH283		X		TIMING 04 MODEL 12/9/03 INTRO
HYUNDAI	SANTA FE	4-DR 2WD SUV GLS V6 3.5 AUTO	60472	X			
		4-DR 2WD SUV LX V6 3.5 AUTO	60482	X			
		4-DR 4WD SUV GLS V6 3.5 AUTO	60572	X			
		4-DR 4WD SUV LX V6 3.5 AUTO	60582	X			
INFINITI	FX35	4-DR 2WD SUV	7721	X			
		4-DR 2WD SUV W/AVAIL OP	8721		X		
		4-DR AWD SUV	7741	X		OP	
	FX45	4-DR AWD SUV W/AVAIL OP	8741		X		OP
		4-DR SUV AWD	7781	X			OP
ISUZU	ASCENDER		H46	X		4-DR 2WD SPORT UTILITY S AUTO	TIMING 03 MODEL 12/3/02 INTRO
			N46	X		4-DR 4WD SPORT UTILITY S AUTO	TIMING 03 MODEL 12/3/02 INTRO
	RODEO	4-DR 2WD S V6 3.2 5-SP	R45	X			
		4-DR 2WD S V6 3.5 5-SP	G44	X			
		4-DR 4WD S V6 3.5 AUTO	Q44	X			



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MAKE	MODEL	BODY STYLE	MODEL CODE	YES	NO	BODY STYLE	COMMENT CODE	COMMENTS
JEEP	GR CHEROKEE WRANGLER	4-DR 2WD WAGON OVERLAND WRANGLER SPORT RHD	WJTS74 TJUH77	X				
				X				
KIA	SORENTO	2WD 4-DR LX 5-SP 4WD 4-DR LX 5-SP	72221 72421	X				
				X				
LAND ROVER	FREELANDER			X		3-DR SPORT UTILITY SE3 AWD	TIMING	03 MODEL 11/11/02 INTRO
LEXUS	RX330	4-DR 2WD SPORT UTILITY 4-DR 4WD SPORT UTILITY	9420 9424	X				
				X				
LINCOLN	AVIATOR	4-DR AWD 310	U88 310		X		DIFSC	
MAZDA	MPV	4-DR MINIVAN LX S-V	MP2 LSSV	X				
MERCURY	MONTEREY	4-DR WAGON CONVENIENCE 100 4-DR WAGON LUXURY 120 4-DR WAGON PREMIER 130	A20 100 A20 120 A20 130	X X X				
	MOUNTAINEER		FAD/110A FAK/310A FAH/120A FAO/320A FAC/105A FAJ/305A FAG/115A FAN/315A FAI/125A FAP/325A	X X X X X X X X X X		4-DR 2WD LUXURY SPORT UTILITY 4.0 4-DR AWD LUXURY SPORT UTILITY 4.0 4-DR 2WD PREMIER SPORT UTILITY 4.0 4-DR AWD PREMIER SPORT UTILITY 4.0 4-DR 2WD CONVENIENCE SPORT UTILITY 4.6 4-DR AWD CONVENIENCE SPORT UTILITY 4.6 4-DR 2WD LUXURY SPORT UTILITY 4.6 4-DR AWD LUXURY SPORT UTILITY 4.6 4-DR 2WD PREMIER SPORT UTILITY 4.6 4-DR AWD PREMIER SPORT UTILITY 4.6	DIFSC DIFSC DIFSC DIFSC DIFSC DIFSC DIFSC DIFSC DIFSC DIFSC	
MITSUBISHI	ENDEAVOR	4-DR 2WD LIMITED 4-DR 2WD LS 4-DR 2WD XLS 4-DR AWD LIMITED 4-DR AWD LS 4-DR AWD XLS	MU45-P MU45-D MU45-G MU45-X MU45-F MU45-K	X X X X X X				
NISSAN	PATHFINDER ARMADA	4-DR 2WD LE AUTO 4-DR 2WD SE AUTO 4-DR 2WD OFF-ROAD AUTO 4-DR 4WD LE AUTO 4-DR 4WD SE AUTO 4-DR 4WD SE OFF-ROAD AUTO	4941 4921 4931 4981 4961 4971	X X X X X X				
	QUEST	WAGON 3.5 S AUTO WAGON 3.5 SE AUTO WAGON 3.5 SL AUTO	1031 1061 1041	X X X				

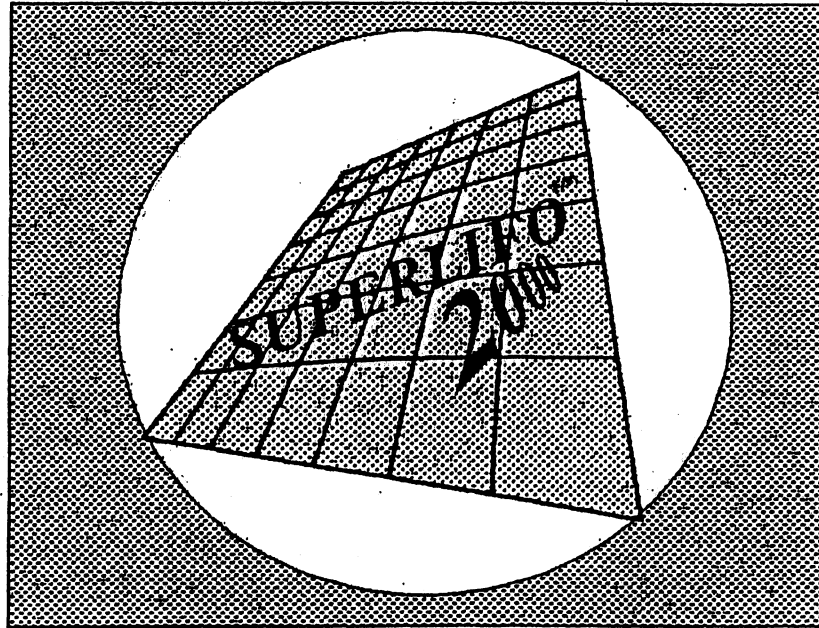


MAKE	MODEL	SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS		IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		COMMENT CODE	PAGE 15 OF 16 COMMENTS
		BODY STYLE	MODEL CODE	YES NO	BODY STYLE		
NISSAN	TITAN	4-DR 2WD CREW CAB LE V8 AUTO	2191	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 2WD CREW CAB SE V8 AUTO	2171	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 2WD CREW CAB XE V8 AUTO	2151	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 2WD KING CAB LE V6 AUTO	1191	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 2WD KING CAB SE V8 AUTO	1171	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 2WD KING CAB XE V8 AUTO	1151	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD CREW CAB LE V8 AUTO	2181	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD CREW CAB SE V8 AUTO	2161	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD CREW CAB SE V8 AUTO	2141	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD KING CAB LE V8 AUTO	1181	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD KING CAB SE V8 AUTO	1161	X		TIMING	04 MODEL 12/1/03 INTRO
		4-DR 4WD KING CAB XE V8 AUTO	1141	X		TIMING	04 MODEL 12/1/03 INTRO
PORSCHÉ	CAYENNE			X	4-DR AWD SPORT UTILITY S V8	TIMING	03 MODEL 8/5/02 INTRO
				X	4-DR AWD SPORT UTILITY TURBO V8	TIMING	03 MODEL 8/5/02 INTRO
SATURN	VUE	4-DR 2WD SPORT UTILITY AUTO	ZLU26 ZLN26	X X			
SUBARU	BAJA	4-DR SPORT UTILITY AWD 5-SP	PC	X	4-DR AWD SPORT UTILITY AUTO	DIFSC	
		4-DR SPORT UTILITY AWD AUTO	PD	X			
		4-DR SPORT UTILITY TURBO AWD 5-SP	PG	X		TIMING	03 MODEL 1/3/03 INTRO
		4-DR SPORT UTILITY TURBO AWD AUTO	PH	X		TIMING	04 MODEL 11/4/03 INTRO
		4-DR SPORT UTILITY TURBO W/LTH AUTO	PF	X		TIMING	04 MODEL 11/4/03 INTRO
	FORESTER	4-DR XT 5-SP	CI	X			
		4-DR XT AUTO	CJ	X		OP	
		4-DR XT W/PREM PKG AUTO	CK	X		OP	
SUZUKI	GR VITARA	4-DR 2WD EX AUTO	LFM89F	X			
		4-DR 4WD EX AUTO	LJM89T	X			
	VITARA	4-DR 2WD V6 LX 5-SP W/AW	LLN86E LX	X			
		4-DR 2WD V6 LX AUTO W/AW	LLN89E LX	X			
		4-DR 4WD V6 LX 5-SP W/AW	LKN86E LX	X			
		4-DR 4WD V6 LX AUTO W/AW	LKN89E LX	X			
TOYOTA	4 RUNNER		8646	X	4-DR 2WD SPORT UTILITY V6	TIMING	03 MODEL 11/1/02 INTRO
			8666	X	4-DR 4WD SPORT UTILITY V6	TIMING	03 MODEL 11/1/02 INTRO
	HIGHLANDER	4-DR 2WD V6 LTD W/3RD ROW	6932	X			
		4-DR 2WD V6 W/3RD ROW	6918	X			
		4-DR 2WD W/3RD ROW	6912	X			
			6916	X	4-DR 2WD SPORT UTILITY AUTO	DIFSC	4TH DIGIT CHANGE
		4-DR 4WD V6 LTD W/3RD ROW	6938	X			
	RAV4	4-DR 4WD V6 W/3RD ROW	6928	X			
		2WD 4-DR 5-SP	4419	X			
		2WD 4-DR AUTO	4418	X			
		4WD 4-DR 5-SP	4429	X			
		4WD 4-DR AUTO	4428	X			



SUPERLIFO™ - NEW ITEMS LIST FOR CALENDAR YEAR 2003 DEALERS				IRS MOTOR VEHICLE INDUSTRY (DECEMBER, 2003 CALENDAR YEAR)		PAGE 16 OF 16	
MAKE	MODEL	BODY STYLE	MODEL CODE	YES NO	BODY STYLE	COMMENT CODE	COMMENTS
TOYOTA	SIENNA	7 PASS VAN CE FWD AUTO	5326	X			
		7 PASS VAN LE AWD AUTO	5366	X			
		7 PASS VAN LE FWD AUTO	5336	X			
		7 PASS VAN LTD AWD AUTO	5386	X			
		7 PASS VAN XLE AWD AUTO	5376	X			
		7 PASS VAN XLE FWD AUTO	5346	X			
		8 PASS VAN CE FWD AUTO	5328	X			
		8 PASS VAN LE FWD AUTO	5338	X			
	TUNDRA	2WD DOUBLE CAB AUTO	7744	X			
		2WD DOUBLE CAB LTD AUTO	7748	X			
		4WD DOUBLE CAB AUTO	7844	X			
VOLKSWAGEN	TOUAREG	4-DR UTILITY V6 3.2 AUTO TIP	7LABC1	X			
		4-DR UTILITY V6 4.2 AUTO TIP	7LACM1	X			
		4-DR UTILITY V8 4.2 AUTO TIP	7LADM1	X			
		4-DR UTILITY V10 TDI 5.0 AUTO TIP	7LAEH1	X			
VOLVO	90 SERIES	XC90 2.5T FWD AUTO	XC90 2.5TAFWD	X		DIFSC	

**LESS EXPENSIVE
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SUPERLIFO, L.L.C.

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WILLARD J. DE FILIPPS, CPA, P.C., MANAGER**

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