REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Sec. 91 (B) & (C), Tax Code
BIR Ruling No. 550-19
OT-277-2022
[illegible] 01 2022

MRS. ROSABELLA L. ONGPIN

Dear Mrs. Ongpin:

This refers to your request on behalf of the heirs of the late **MARCO GABRIEL C. ONGPIN** for a reasonable extension to pay the estate tax due on October 8, 2021 through cash installment under the following schedule:

Installment	Amount	Due Date
1		October 6, 2021
2		January 6, 2022
3		April 6, 2022
4		July 6, 2022

Total		

It is represented that Marco Gabriel C. Ongpin passed away on October 8, 2020. The request is premised on the considerable amount to be paid in estate tax, limitation of funds available, and size of the estate.

In reply thereto, please be informed that Section 91 (B) and (C) of the National Internal Revenue Code of 1997, as amended, provide, viz.:

> *"SEC. 91. Payment of tax. -*
>
> *xxx xxx xxx*
>
> *(B) Extension of Time. – When the Commissioner finds that the payment on the due date of the estate tax or any part thereof would impose undue hardship upon the estate or any of the heirs, he may extend the time for payment of such tax or any part thereof not to exceed five (5) years, in case the estate is settled through the courts, or two (2) years in case the estate is settled extrajudicially. In such case, the amount in respect of which the extension is granted shall be paid on or before the date of the expiration of the*

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> *period of the extension, and the running of the Statute of Limitations for assessment as provided in Section 203 of this Code shall be suspended for the period of any such extension.*
>
> *xxx xxx xxx*
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> *If an extension is granted, the Commissioner my require the executor, or administrator or beneficiary, as the case may be, to furnish a bond in such amount, not exceeding double the amount of the tax and with such sureties as the Commissioner deems necessary, conditioned upon the payment of the said tax in accordance with the terms of the extension.*
>
> *(C) Payment by Installment. – In case the available cash of the estate is insufficient to pay the total estate tax due, payment by installment shall be allowed within two (2) years from the statutory date for its payment without civil penalty and interest."*

In view of the foregoing justifiable reason, your request for extension to pay the estate tax is hereby granted, such that the executor/administrator or heirs of **Marco Gabriel C. Ongpin** shall pay the estate tax in four (4) installments, the last installment being on July 6, 2022, without civil penalty and interest, and with such sureties as the Commissioner deems necessary, conditioned upon the payment of the said tax in accordance with the terms of the extension.

Please be guided accordingly.

Very truly yours,

LARRY M. BARCELO
Assistant Commissioner
Legal Service

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