REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

February 20, 2004

REVENUE MEMORANDUM CIRCULAR NO. 28-2004

SUBJECT **:** Publishing Revenue Memorandum Order No. 39-87 (RMO 39-87) dated December 8, 1987 Re: Deficiency Tax Assessments of P100 or Less Shall No Longer Be Assessed Nor Collected

T O **:** All Internal Revenue Officers and Others Concerned

For the information and guidance of all concerned, reiterated hereunder are the contents of RMO 39-87 with the subject: "***Deficiency Tax Assessments of P100 or Less Shall No Longer Be Assessed Nor Be Collected***":

> "In order to save man-hours for a more productive endeavor and minimize cost in collecting delinquent accounts, and pursuant to Section 204 and to the last sentence of the first paragraph of Section 205 of the Tax Code, as amended, deficiency tax assessments of P100 or less, excluding surcharge and interest shall no longer be assessed nor be collected.
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> "The exception to this policy, however, is in case where, in a single investigation, several assessments were made against the taxpayer and the total deficiency tax assessments, excluding surcharge and interest, exceeds P100, all of the said assessments shall be collected.
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> "All of the previous deficiency tax assessments involving P100 or less shall be removed from your General Control Ledger in the following manner: List all of those deficiency tax assessments of P100 or less under BIR Form No. 12.47 and issue one (1) ATCA for all of them, and show as a credit entry under the column "ATCA" of the General Control Ledger the total number of cases cancelled or removed and the total amount involved. Copies of the list under BIR Form No. 12.47 and copies of the ATCA be distributed according to existing instructions.

"Effective January 1988, your General Control Ledger shall no longer include any deficiency tax or P100 or less. Any Order or any provision thereof which is inconsistent herewith is hereby revoked or modified accordingly.

(Sgd.) Bienvenido A. Tan, Jr.
Commissioner"

All concerned revenue officials and employees are directed to comply with said RMO and are hereby enjoined to give this Circular as wide a publicity as possible.

(Original Signed)
GUILLERMO L. PARAYNO, JR.
Commissioner of Internal Revenue

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