[Date]

[Internal Revenue Service Agent Name]
[Internal Revenue Service Office Address]
[City, State, Zip Code]

RE: [Taxpayer Name] - Tax ID: [XX-XXXXXXX] - Audit Defense Support for Cost Segregation Study

Dear [Agent Name],

This letter is submitted in response to the inquiry regarding the Cost Segregation Study performed for the property located at [Property Address], which was placed in service on [Date].

The objective of the Cost Segregation Study was to identify and reclassify assets that qualify for shorter recovery periods (5, 7, or 15 years) versus the standard real property recovery periods (27.5 or 39 years), in strict accordance with the IRS Cost Segregation Audit Techniques Guide (ATG).

To support the depreciation deductions claimed, we provide the following technical justifications:

- **Methodology:** The study utilized an engineering-based approach, involving a site inspection, a detailed review of construction blueprints, and an analysis of contractor invoices and closing statements.
- **Legal Precedent:** Assets were classified based on the criteria established in *Hospital Corp. of America v. Commissioner* and Revenue Ruling 2004-11, distinguishing between "Section 1245" personal property and "Section 1250" real property.
- **Documentation:** Each reclassified asset is supported by a detailed asset listing, unit-of-property identification, and a clear nexus to the functional operation of the taxpayer's business rather than the structural integrity of the building.

We are prepared to provide the full engineering report, photographic evidence, and workpapers upon request to substantiate these findings. Our firm stands behind the technical accuracy of this study and is available to discuss the specific allocations made.

Please contact me directly at [Phone Number] or [Email Address] to schedule a technical review or for any further clarification.

Sincerely,

[Signature]
[Name of Principal/Engineer]
[Firm Name]
[Contact Information]