



THE Pension Digest

April 2024
Published Since 1984

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“The Pension Specialists”



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Tax Relief In Disaster Situations For IRAs

On page 8 are listed the many disaster areas which have been declared by FEMA in 2024. The IRS and the tax code grants tax relief to individuals and businesses in a disaster area in four basic ways. FEMA is the acronym for the Federal Emergency Management Agency.

First, the taxpayer is given an extended time to complete a tax transaction. For example, certain residents of Maine now have a tax filing deadline of either June 17, 2024 or July 15, 2024 rather than April 15, 2024. This means that certain residents of Maine may make their 2023 IRA contribution by July 15, 2024 rather than April 15, 2024. Another example, a taxpayer who withdraws IRA funds on January 17, 2024 normally must complete her rollover within 60 days. She is now allowed to complete her rollover by July 15, 2024.

A person or business could establish and fund a SEP-IRA plan for 2023 even though the individual or the business did not have a tax extension.

You will note on page 8 that there is a separate deadline defined by the IRS for each disaster. These deadline extensions are to June 17, July 15, August 7, and October 7 for those impacted by the terrorist attacks in Israel.

The taxpayer is able to complete his or her tax return and be able to claim the associated tax benefits because the contributions are defined to be timely. The taxpayer will want to attach a note of explanation to their tax return because there is a long time lag when the Form 5498 is furnished to the IRS.

The purpose of the article on pages 2 and 3 is to explain how the IRA custodian/trustee is to properly report these “late” contributions to the IRS and to your customer, the taxpayer. A “late” annual contribution is a postponed contribution. A “late” rollover contribution is to be processed using the late rollover certification procedures.

The second tax benefit is, a person who withdraws funds from their IRA does not owe the 10% additional tax if she or he is under age 59½.

The third tax benefit is, a person is able to have their distribution taxed over a three year time period rather than just the one year. The law was changed By SECURE Act 2.0 in that such a distribution is now limited to \$22,000 rather than \$100,000.

The fourth tax benefit is, a person has three years in which to repay their distribution rather than the normal 60 day rule. In addition, the once per year rollover rule does not apply to a disaster distribution.

Note that when the IRS announces these extended filing deadlines that a taxpayer still has the right to request an extension to file their tax return but such an extension does delay having to pay the tax which is owing.

Deadlines for 2023 5498 Forms

Type of Account	Type of Form	Due to Owner	Due to IRS
Traditional	5498	5/31/24	5/31/24
Roth	5498	5/31/24	5/31/24
HSA	5498-SA	5/31/24	5/31/24
CESA	5498-ESA	5/2/24	5/31/24

Form 5498 Reporting For Postponed Contributions, Late Rollovers And Repayment Contributions.

Jane Doe lives in a disaster area. She has until July 15, 2024 to make her contribution for 2023. She makes an IRA contribution of \$7,500 for 2023 on May 15, 2024. How is her contribution reported on her Form 5498? It is reported on the 2024 Form in box 13 as a postponed contribution for 2023. This contribution is not reported on the 2023 Form 5498.

The IRS should do a better job of explaining how an IRA custodian/trustee is to report the making of postponed contributions, late rollovers repayment contributions and a rollover of a rollover of a qualified plan loan offset amount. Some definitions would be helpful.

A repayment is self-explanatory. A person repays a prior distribution. The standard 60-day rule for a rollover does not apply. A longer period is granted for repaying the distribution. A person has three years to repay a disaster distribution or a birth or adoption distribution. A person has two years to repay a qualified reservist distribution.

A postponed contribution is not self-explanatory. A person in a combat zone or a hazardous zone has had their tax year suspended. From a practical standpoint this is similar to having been granted a tax extension. A person in a disaster area has also been granted a tax extension for certain tax deadlines extended.

Set forth are the 2023 Form 5498 and the 2024 Form 5498.

2023		<input type="checkbox"/> VOID <input type="checkbox"/> CORRECTED	
TRUSTEE'S or ISSUER'S name, street address, city or town, state or province, country, and ZIP or foreign postal code		OMB No. 1545-0747	
		2023	
		Form 5498	
TRUSTEE'S or ISSUER'S TIN		PARTICIPANT'S TIN	
PARTICIPANT'S name			
Street address (including apt. no.)			
City or town, state or province, country, and ZIP or foreign postal code			
Account number (see instructions)			
Form 5498		Cat. No. 50010C www.irs.gov/Form5498 Department of the Treasury - Internal Revenue Service	

2024		<input type="checkbox"/> VOID <input type="checkbox"/> CORRECTED	
TRUSTEE'S or ISSUER'S name, street address, city or town, state or province, country, and ZIP or foreign postal code		OMB No. 1545-0747	
		2024	
		Form 5498	
TRUSTEE'S or ISSUER'S TIN		PARTICIPANT'S TIN	
PARTICIPANT'S name			
Street address (including apt. no.)			
City or town, state or province, country, and ZIP or foreign postal code			
Account number (see instructions)			
Form 5498		Cat. No. 50010C www.irs.gov/Form5498 Department of the Treasury - Internal Revenue Service	

An IRA contribution for 2023 may be made from January 1, 2023 to April 15, 2024. Any contribution made in 2024 after April 15, 2024 for 2023 is a postponed contribution. It is to be reported on the 2024 Form 5498 in boxes 13 a-c. Due to the many declared federal disasters during 2023, there will be postponed contributions to be reported to the individual and the IRS on the 2024 Form 5498.

An IRA contribution for 2022 may be made from January 1, 2022 to April 15, 2023. Any contribution made in 2023 after April 15, 2023 for 2022 is a postponed contribution. It is to be reported on the 2023 Form 5498 in boxes 13 a-c.. Due to the many declared federal disasters during 2022, there will be postponed contributions to be reported to the individual and the IRS on the 2023 Form 5498.

Nonstandard rollovers are reported in boxes 13 and 14. They are not reported in box 2 which is used for standard rollovers.

Boxes 13 a-c report postponed contributions. If a person has a postponed contribution for two or more different tax years, then a separate Form 5498 is to be prepared for each year. These boxes also report late rollover contributions. If a person has both a postponed contribution and a late rollover, then two 5498 forms are to be prepared.

Box 13a reports the amount of the postponed contribution.

Box 13b reports the year for which the postponed contribution is made. This box is left blank for a late rollover.

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5498 Reporting,
Continued from page 2

Box 13c reports the reason the postponed contribution is being made. The IRS has assigned codes to be used to identify the reason.

“FD” is used if the person is an affected taxpayer because he or she was in a federally designated disaster area.

“SC” is used if a person has certified that he or she is eligible to make a late rollover because she or he met one or more of the circumstances required by IRS guidance.

“PO” is used if a person made a rollover of a qualified plan loan offset amount.

One must review other special codes the IRS has created when a person makes a postponed contribution because of service in a combat zone or hazardous duty area.

The IRS has box 14a and 14b handle repayments. The IRS instructions do not expressly state that two or more 5498s must be prepared if has multiple reasons for making the repayments, but one must prepare multiple forms.

The amount of the repayment contribution is to be reported in Box 14a and the applicable code is to be reported in box 14b. A person may make a repayment of a qualified reservist distribution, a qualified disaster or a qualified birth or adoption distribution. A person has 3 years to make such repayments.

Box 14b reports the reason the repayment contribution is being made. The IRS has assigned codes to be used to identify the reason.

“QR” is used if the person repays a qualified reservist distribution.

“DD” is used if the person repays a qualified disaster distribution

“BA” is used if the person repays a qualified birth or adoption distribution.

And until April 15 of the following year to rollover a qualified plan loan offset amount.

2024 IRS Extends RMD Relief To 2024 For Certain IRA and Pension Beneficiaries IRS Notice 2024-35

The IRS initially granted tax relief to certain beneficiaries for certain missed RMDs for 2021 and/or 2022. This relief was granted in Notice 2022-54.

This relief was granted to a non-EDB beneficiary of an IRA accountholder who had died after 2019 and who had died after their required beginning date. Such a beneficiary was required to continue the distribution schedule (but modified) being used by the deceased IRA accountholder and the beneficiary had to close the inherited IRA under the 10-year rule. There have been beneficiaries who did not do so because they thought the 10-year rule applied. Technically, these beneficiaries owed the RMD tax.

In 2023 the IRS issued Notice 2023-53 and extended this RMD relief for 2023.

The IRS states its relief as follows, “To the extent a taxpayer did not take a specified RMD, the IRS will not assert that the taxpayer owes the RMD excise tax.”

And now in Notice 2024-35 the IRS again extends this relief to 2024. The IRS also uses this Notice 2024-35 to furnish additional information about the RMD rules.

The notice provides, “Final regulations regarding RMDs under section 401(a)(9) and related provisions are anticipated to apply for determining RMDs for calendar years beginning on or after January 1, 2025.” Note the IRS is not stating that the final regulations will be finished or adopted in 2024. These regulations could be finished sometime in 2025 with a retroactive effective date of January 1, 2025.

The IRS clarifies that if the beneficiary is an eligible designated beneficiary that he or she uses the standard life distribution rule and that the 10-year rule does not apply to this beneficiary. Once this EDB dies, the next beneficiary must continue the same distribution schedule, and the 10-year rule applies to him or her.

We have asked the IRS to clarify that the missed or skipped RMDs for 2021-2024 will not need to be withdrawn in 2025. They must be withdrawn by the applica-

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RMD Relief,
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ble 10-year deadline, if applicable. The general tax rule is – an RMD exists until it is withdrawn.

The IRS issuance of additional tax relief is certainly good news to those beneficiaries who need it or for those who want to take advantage of an opportunity to skip taking their 2024 RMD.

Understanding What Services May Be Provided To An IRA Beneficiary

The IRS has set forth in the instructions for Forms 1099-R and 5498 guidance that the general rule is that it is the responsibility of the IRA beneficiary to comply with the tax rules applying to beneficiaries. An IRA custodian/trustee is not required to prepare the RMD notice for a beneficiary.

I understand that some banks adopt the approach of waiting until the beneficiary comes in to bank to notify the bank of the IRA accountholder's death. There will be times when the funds will be escheated to the state.

I believe a more proactive approach should be used once the bank has knowledge that an IRA accountholder has died. Once the bank has knowledge of the IRA accountholder's death and after a reasonable amount of time has passed, the bank should try to contact the beneficiary.

Why? The bank owes certain duties to this beneficiary. The bank in establishing the IRA for the IRA accountholder understood that the IRA accountholder might die and that the funds would then benefit the designated beneficiary. The IRA of a deceased IRA accountholder does not cease to exist just because the IRA accountholder has died. The beneficiary is the new designated beneficiary of the IRA. The law requires a beneficiary to withdraw required minimum distributions by certain deadlines and the law imposes an excise tax of 10% or 25% on a beneficiary who fails to do. The excise tax used to be 50%.

The CWF IRA plan agreement provides in section 1.7 of Article VIII, "Your beneficiary is required to complete such forms and furnish such information as we deem appropriate in order to handle a distribution request, including a transfer distribution."

I believe a bank should acknowledge that a benefi-

ary who has inherited IRA funds is a client of the bank and that the CIP rules need to be satisfied within a reasonable time after the IRA accountholder has died. Although I think a bank may try to argue that the CIP rules not apply to a beneficiary because there is not new account, as a practical matter the IRS rules and the CIP reporting rules are very similar. The conservative approach for a bank is to comply with both rules.

The CIP rules state that these rules do not apply to a beneficiary until the IRA accountholder has died, but they do apply once the IRA accountholder has died.

The IRS reporting rules are distinct and separate from the CIP rules. However, both of these rules require that a beneficiary furnish to the bank his or her name, address and social number or tax identification number. The IRS will not find acceptable an incomplete reporting form. With IRAs there are two IRS reporting - Form 1099-R to report distributions and Form 5498 to report contributions and the fair market value as of 12/31.

The IRS sets forth its guidance with respect to beneficiaries in the instructions for Form 1099-R and Form 5498 and the proposed RMD regulation. A beneficiary is subject to the RMD rules. A beneficiary will owe the 10% or 25% excise tax if she or he has an excess accumulation for a given tax year. An IRA custodian is not required to send an RMD notice to a beneficiary. An IRA custodian should be aware that a beneficiary is able to argue that the IRS model IRA form 5305-A requires that distributions are to be made to the beneficiary after the IRA accountholder's death. That is, there is no express statement in this form that the beneficiary must request the distribution.

An IRA custodian must report a distribution made to a beneficiary for federal income tax reasons on Form 1099-R. The bank must obtain the required information for preparing this form - name, address, SSN/TIN, etc.

An IRA custodian must report the fair market value on Form 5498 of each inherited IRA as of each 12/31 of each year. This is not required if beneficiary withdraws 100% of his or her share of the inherited IRA. The special titling which is required for an inherited must be used (e.g. Jane Doe as beneficiary of Mary DOE's IRA) on the Form 5498. Again, the bank must have the personal information need to correctly prepare this form.

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Understanding Services,
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There is a chance that a court could find a bank has some liability if it has not adopted some reasonable procedures to assist a beneficiary.

The IRS in its proposed RMD regulation has adopted a new rule for the year the IRA accountholder dies. It used to be the deadline was December 31 of that year. If an IRA accountholder who was taking RMDs died late in the year without having taken their RMD, then the beneficiary had to withdraw that amount by 12/31 and the beneficiary owed the RMD excise tax unless the beneficiary would submit a request to waive the tax and the IRS waived the tax. The IRS has changed the deadline to be 4/15 of the following year in order to give beneficiaries additional time so the RMD excise tax would not be owed.

The penalty for preparing an incorrect Form 1099~R is \$290 (x 2).

The penalty for preparing an incorrect Form 5498 is \$50 (x 2).

In summary, a bank will want to decide what services it will offer to IRA beneficiaries and then communicate its policies and procedures. It may resign as the IRA custodian/trustee and then transfer the funds to another IRA custodian/trustee. It may charge a fee to service the inherited IRA. It may perform limited services with respect to the inherited IRA.

Please call me at 1-800-346-3961 if you wish to discuss further.

Business Opportunity – Serving IRA Owners Wanting To Impose Distribution Restrictions On An IRA (Traditional or Roth) Beneficiary

Most IRA owners probably do not understand that they have or could have the right to impose one or more distribution restrictions on an IRA beneficiary. The IRA agreement must authorize such a restriction.

Why do such a thing? A person may not want their children or grandchildren to spend their IRA inheritance too quickly. Some people will certainly be willing to pay reasonable fees for this additional service.

For example, Jane Smith has three children who are her Roth IRA beneficiaries. She has \$90,000 in her Roth IRA. Since she opened her Roth IRA in 2004, each and every distribution from the inherited Roth IRA to her children will be qualified or tax-free. The Roth IRA, if invested well should earn tax-free income for the next 30-60 years depending on the beneficiary's age.

In her beneficiary designation Jane could stipulate the following or something similar. Each year the beneficiary is to be paid his or her required distribution for such year by November 30th. Until the age of 30, each beneficiary is limited to withdrawing an amount no more than 300% of his or her required distribution for such year.

An IRA custodian/trustee will wish to negotiate reasonable fees to administer the restricted inherited IRA with the IRA owner prior to his death. It may be that the parties should agree the inherited Roth IRAs would only be able to be transferred to another Roth IRA custodian/trustee if certain conditions would be met.

IRA funds may be very long term deposit and investment funds. Why not try to acquire such accounts?

Retirement Topics: Exceptions To Tax On Early Distributions

Most retirement plan distributions are subject to income tax and may be subject to an additional 10% tax. *

Generally, the amounts an individual withdraws from an IRA or retirement plan before reaching age 59½ are called “early” or “premature” distributions. Individuals must pay an additional 10% early withdrawal tax unless an exception applies.

Exceptions to the 10% additional tax

Exception	The distribution will NOT be subject to the 10% additional early distribution tax in the following circumstances:	Qualified plans (401(k), etc.)	IRA, SEP SIMPLE IRA* and SARSEP plans	Internal Revenue Code sections(s)
Age	after participant/IRA owner reaches age 59½	yes	yes	72(t)(2)(A)(i)
Automatic enrollment	permissive withdrawals from a plan with auto enrollment features	yes	yes for SIMPLE IRAs and SARSEPS	414(w)(1)(B)
Birth or adoption	distributions up to \$5,000 per child for qualified birth or adoption expenses	yes	yes	72(t)(2)(H)
Corrective distributions	corrective distributions (and associated earnings) of excess contributions, excess aggregate contributions and excess deferrals, made timely	yes	n/a	401(k)(8)(D), 401(m)(7)(A), 402(g)(2)(C)
Death	after death of the participant/IRA owner	yes	yes	72(t)(2)(A)(ii)
Disability	total and permanent disability of the participant/IRA owner	yes	yes	72(t)(2)(A)(iii)
Disaster recovery distribution	up to \$22,000 to qualified individuals who sustain an economic loss by reason of a federally declared disaster where they live	yes	yes	72(t)(2)(M), 72(t)(11)
Domestic abuse victim distribution	to a victim of domestic abuse by a spouse or domestic partner, up to the lesser of \$10,000 or 50% of account (distributions made after 12/31/2023)	yes	yes	72(t)(2)(K)
Domestic relations	to an alternate payee under a Qualified Domestic Relations Order	yes	n/a	72(t)(2)(C)
Education	qualified higher education expenses	no	yes	72(t)(2)(E)
Emergency personal expense	one distribution per calendar year for personal or family emergency expenses, up to the lesser of \$1,000 or vested account balance over \$1,000 (made after 12/31/2023)	yes	yes	72(t)(2)(I)
Emergency savings account	distributions from a pension-linked emergency savings account (made after 12/31/2023)	yes	n/a	402A(e)(7)

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Exception	The distribution will NOT be subject to the 10% additional early distribution tax in the following circumstances:	Qualified plans (401(k), etc.)	IRA, SEP SIMPLE IRA* and SARSEP plans	Internal Revenue Code sections(s)
Equal payments	series of substantially equal payments	yes	yes	72(t)(2)(A)(iv)
ESOP	dividend pass through from an ESOP	yes	n/a	72(t)(2)(A)(vi)
Homebuyers	qualified first-time homebuyers, up to \$10,000	no	yes	72(t)(2)(F)
Levy	because of an IRS levy of the plan	yes	yes	72(t)(2)(A)(vii)
Medical 213(a)	amount of unreimbursed medical expenses (>7.5% AGI)	yes	yes	72(t)(2)(B)
Medical	health insurance premiums paid while unemployed	no	yes	72(t)(2)(D)
Military	certain distributions to qualified military reservists called to active duty	yes	yes	72(t)(2)(G)
Returned IRA contributions	if withdrawn by extended due date of return, not including earnings on these returned contributions	n/a	yes	408(d)(4)
Rollovers	in-plan Roth rollovers or eligible distributions contributed to another retirement plan or IRA within 60 days (also see FAQs: Waivers of the 60-day rollover requirement)	yes	yes	402(c), 402A(d)(3), 403(b)(8), 403(a)(4), 408(d)(3), 408A(d)(3)
Separation from service	the employee separates from service during or after the year the employee reaches age 55 (age 50 for public safety employees of a state, or political subdivision of a state, in a governmental defined benefit or defined contribution plan) **	yes	no	72(t)(2)(A)(v) 72(t)(10)
Terminal illness	distributions made to a terminally ill employee, on or after the date the employee has been certified by a physician as having a terminal illness	yes	n/a	401(k)(2)(B)(i)(I)
Unemployed health insurance	distributions equal to the amount paid for family health insurance by an individual who was unemployed for 12 weeks and received unemployment compensation in the year of the distribution or the subsequent year	n/a	yes	72(t)(2)(D)

*** Retirement plans:** The 10% additional tax generally applies to early distributions from qualified plans, 403(a) or (b) annuity plans and traditional IRAs, including IRAs that are connected to a SIMPLE IRA or SEP plan maintained by an employer. Qualified plans include traditional pension plans, cash balance plans, 401(k) plans and profit-sharing plans, among others. Distributions from a governmental 457(b) plan are not subject to the 10% additional tax except for distributions attributable to rollovers from another type of plan or IRA.

SIMPLE IRA: Distributions made from a SIMPLE IRA plan within the first 2 years of participation incur a 25% additional tax instead of 10%.

**** Qualified public safety employees:** The separation from service exception for public safety employees who are age 50 or over also includes specified federal law enforcement officers, corrections officers, customs and border protection officers, federal firefighters, private-sector firefighters, and air traffic controllers. An exemption is allowed for distributions from defined benefit plans, defined contribution plans or other types of governmental plans, such as the TSP. See IRC Section 72(t)(10). This exemption also applies to private-sector firefighters.

2024 IRS Tax Relief By Date

Check the list below for all disaster relief guidance issued by the IRS by date

- ME-2024-05, IRS announces tax relief for taxpayers impacted by severe storms and flooding in Maine; various deadlines postponed to July 15
- RI-2024-06, IRS announces tax relief for taxpayers impacted by severe storms and flooding in Rhode Island
- RI-2024-05, IRS announces tax relief for taxpayers impacted by severe storm and flooding in Rhode Island; various deadlines postponed to July 15
- IR-2024-94, IRS announces tax relief for taxpayers impacted by severe storms, flooding in Rhode Island, various deadlines postponed to July 15
- IR-2024-93, IRS: Maine taxpayers impacted by severe storms, flooding qualify for tax relief; various deadlines postponed to July 15
- IR-2024-90, IRS reminder to taxpayers affected by terrorist attacks in Israel: 2023 returns and payments are now due Oct. 7; other relief available
- IR-2024-82, IRS further extends tax relief for Hawaii wildfire victims; 2023 returns, payments, other deadlines postponed to Aug. 7
- AK-2024-04, IRS: Tax relief for taxpayers impacted by severe storms, landslides and mudslides in Alaska; various deadlines postponed to July 15
- IR-2024-81, IRS announces tax relief for taxpayers impacted by severe storms, landslides and mudslides in Alaska; various deadlines postponed to July 15
- IR-2024-79, IRS reminder to U.S. taxpayers living, working abroad: File 2023 tax return by June 17; those impacted by terrorist attacks in Israel have until Oct. 7
- WA-2024-01, IRS announces tax relief for taxpayers impacted by wildfires in Spokane, Washington area
- IR-2024-55, IRS: Spokane area taxpayers impacted by wildfires qualify for tax relief; various deadlines postponed to June 17
- CA-2024-02, IRS announces tax relief for taxpayers impacted by severe storms and flooding in San Diego, California
- IR-2024-51, IRS: San Diego area taxpayers impacted by severe storms, flooding qualify for tax relief; various deadlines postponed to June 17
- MI-2024-01, IRS announces tax relief for taxpayers impacted by severe storms, tornadoes and flooding in Michigan
- IR-2024-42, IRS: Michigan taxpayers impacted by severe storms, tornadoes and flooding qualify for tax relief; various deadlines postponed to June 17
- WV-2024-01, IRS announces tax relief for taxpayers impacted by severe storms, flooding, landslides and mudslides in West Virginia
- IR-2024-35, IRS: West Virginia taxpayers impacted by severe storms, flooding, landslides and mudslides qualify for tax relief; various deadlines postponed to June 17
- ME-2024-02, IRS announces tax relief for taxpayers impacted by severe storms and flooding in Maine
- IR-2024-32, IRS: Maine taxpayers impacted by severe storms and flooding qualify for tax relief; various deadlines postponed to June 17
- IR-2024-29, IRS reminder to disaster victims with extensions: File 2022 returns by Feb. 15; all or parts of 8 states and 2 territories affected
- IR-2024-27, IRS: Rhode Island taxpayers impacted by storms qualify for tax relief; various deadlines postponed to June 17
- RI-2024-01, IRS announces tax relief for taxpayers impacted by severe storms, flooding and tornadoes in Rhode Island
- CT-2024-01, IRS announces tax relief for taxpayers impacted by severe storms, flooding and potential dam breach in Connecticut
- IR-2024-17, IRS: Connecticut taxpayers impacted by storms qualify for tax relief; various deadlines postponed to June 17