Title
Oceanic Wireless Network, Inc. vs. Commissioner of Internal Revenue

Facts
Oceanic Wireless Network, Inc. (petitioner), received a deficiency tax assessment from the Bureau of Internal Revenue (BIR) on March 17, 1988, amounting to P8,644,998.71 for the taxable year 1984. The petitioner protested this assessment in a letter dated April 12, 1988. The Chief of the BIR's Accounts Receivable and Billing Division, acting on behalf of the Commissioner of Internal Revenue (respondent), denied the protest for lack of supporting documents on January 24, 1991. Failure to pay these assessments led to the issuance of warrants of distraint and/or levy and garnishment served in October 1991. The petitioner filed a Petition for Review with the Court of Tax Appeals (CTA) on November 8, 1991 (CTA Case No. 4668), which was dismissed for being filed beyond the thirty-day period deemed from the presumed receipt of the denial letter, making the CTA deem it a lack of jurisdiction. The petitioner's subsequent Motion for Reconsideration was denied, leading to an appeal to the Court of Appeals, which also dismissed the petition. The petitioner then brought the case to the Supreme Court, asserting errors in declaring the demand letter as the final decision of the Commissioner of Internal Revenue and in finding that the protests had become final and executory.

Issues
1. Whether a demand letter for tax deficiency assessments issued and signed by a subordinate officer on behalf of the Commissioner of Internal Revenue is deemed final and executory, granting the Court of Tax Appeals jurisdiction.
2. Whether the petitioner's failure to file an appeal within thirty (30) days from the receipt of the demand letter rendered the assessment final and executory.

Court's Decision
The Supreme Court ruled affirmatively on both issues. It held that a demand letter for payment of delinquent taxes may be considered a decision on a disputed or protested assessment if it signifies a character of finality. The Court confirmed that the letter of January 24, 1991, constituted the final action on the petitioner's request for reconsideration. It also underscored the delegation power of the Commissioner of Internal Revenue, permitting such a decision even if made by a subordinate. The Supreme Court found that the petitioner failed to appeal within the requisite 30-day period, deeming the assessment final and executory.

Doctrine
A demand letter for tax deficiencies issued by the Commissioner of Internal Revenue’s delegatee is considered final and executory if it signifies a character of finality, making it appealable to the Court of Tax Appeals. The authority of the Commissioner to make tax assessments can be delegated to subordinate officers, and such assessment has the same effect as those directly issued by the commissioner unless reviewed or reversed.

Class Notes
– **Finality of demand letters**: Demand letters serving as the final assessment of tax deficiencies must clearly indicate their final status.
– **Delegation of Authority**: The Commissioner of Internal Revenue can delegate the power to assess tax deficiencies to Division Chiefs or higher-ranking officials.
– **Appeal Period**: Taxpayers have thirty (30) days from receiving the assessment or decision to file an appeal with the Court of Tax Appeals. Failure to do so renders the assessment final and executory.
– **Legal Provisions**: Pertinent provisions in the National Internal Revenue Code (NIRC), as amended by Republic Act No. 8424, and the rules regarding contesting assessments under Section 228 of the NIRC.

Historical Background
This case exemplifies the administrative and judicial processes involving disputed tax assessments and the delegation of the Commissioner of Internal Revenue’s authority. It underscores the critical importance of clear communication regarding the finality of tax decisions and the procedural requisite for taxpayers to timely challenge these decisions.