

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

CAROLINE L. HARRIS  
VICE PRESIDENT, TAX POLICY  
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202/463-5620

October 3, 2018

The Honorable Steven T. Mnuchin  
Secretary of the Treasury  
U.S Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, D.C. 20220

The Honorable Charles P. Rettig  
Commissioner  
Internal Revenue Service (I.R.S.)  
1111 Constitution Avenue, N.W.  
Washington, D.C. 20224

The Honorable David J. Kautter  
Assistant Secretary (Tax Policy)  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, N.W.  
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The Honorable William M. Paul  
Acting Chief Counsel and Deputy Chief  
Counsel (Technical)  
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Office of Associate Chief Counsel  
(International)  
Attention: Leni C. Perkins  
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Office of Associate Chief Counsel  
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Attention: Karen J. Cate  
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CC:PA:LPD:PR  
REG-104226-18  
Room 5203  
Internal Revenue Service  
P.O. Box 7604  
Ben Franklin Station  
Washington, D.C. 20044

*Submitted via Federal eRulemaking Portal*

**RE: Comments on REG-104226-18 (Proposed Rules Relating to §965 Transition Tax)**

Dear Sir or Madam:

The U.S. Chamber of Commerce appreciates the opportunity to provide feedback on REG-104226-18, as published in the Federal Register on August 9, 2018.

The attached chart identifies issues arising under REG-104226-18 and provides suggested solutions as well as any additional explanation the Chamber believes would be helpful in addressing the issue. This feedback is the product of extensive conversations with a very wide array of affected Chamber members. These comments may be considered as representing some of the most serious issues, but are not all the issues concerning Chamber members have regarding REG-104226-18.

The Chamber strongly urges Treasury and the I.R.S. to work closely with the business community to implement the recent tax changes in a manner that would ensure as little disruption as possible to normal business operations and encourage the U.S. economy to achieve its true growth potential. The Chamber looks forward to working with you to address these and other issues as you work to implement the new, pro-growth tax code. Thank you for your time and attention.

Sincerely,



Caroline L. Harris

CC: Lafayette “Chip” G. Harter III, Deputy Assistant Secretary (International Tax Affairs),  
U.S. Department of the Treasury

Douglas L. Poms, International Tax Counsel, U.S. Department of the Treasury

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