

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

CAROLINE L. HARRIS  
VICE PRESIDENT, TAX POLICY  
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May 18, 2018

Office of Associate Chief Counsel (International)  
Attention: Leni C. Perkins  
Internal Revenue Service (I.R.S.), IR-4549  
1111 Constitution Avenue, NW  
Washington, DC 20224

*Via Federal eRulemaking Portal*

RE: Comments on Notice 2018-26

Dear Ms. Perkins:

The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than three million businesses of all sizes, sectors, and regions, as well as state and local chambers and industry associations, and dedicated to promoting, protecting, and defending America's free enterprise system, appreciates the opportunity to provide feedback on Notice 2018-26 as published in the *Internal Revenue Bulletin* on April 16, 2018.

The attached chart identifies issues arising under Notice 2018-26 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 impacted Chamber members. These comments may be considered as representing some of the most serious issues, but are not all the issues concerning Chamber members on Notice 2018-26.

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: David J. Kautter, Assistant Secretary, Office of Tax Policy, U.S. Department of the Treasury

William M. Paul, Chief Counsel and Deputy Chief Counsel (Technical) (Acting), Office of the Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

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

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

Brian Jenn, Deputy International Tax Counsel, Department of the Treasury

Marjorie A. Rollinson, Associate Chief Counsel (International), Internal Revenue Service

Daniel M. McCall, Deputy Associate Chief Counsel (International), Internal Revenue Service

Raymond J. Stahl, Senior Counsel, Office of Associate Chief Counsel (International), Internal Revenue Service

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