

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

CAROLINE L. HARRIS
VICE PRESIDENT, TAX POLICY
& ECONOMIC DEVELOPMENT
CHIEF TAX POLICY COUNSEL
ECONOMIC POLICY DIVISION

1615 H STREET, N.W.
WASHINGTON, D.C. 20062-2000
202/463-5620

February 25, 2019

CC:PA:LPD:PR
(REG-106089-18)
Room 5203
Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20224

Via Federal eRulemaking Portal

RE: Comments on REG-106089-18: Limitation on the Deduction for Business Interest Expense

Dear Sir or Madam:

The U.S. Chamber of Commerce appreciates the opportunity to provide feedback on REG-106089-18, guidance related to the limitation on the deduction for business interest expense after the enactment of recent tax legislation, as published in the *Federal Register* on December 28, 2018.

The attached chart identifies issues arising under REG-106089-18 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 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 REG-106089-18.

The Chamber appreciates the opportunity to provide this feedback on REG-106089-18. The Chamber strongly urges Treasury and the I.R.S. to continue to work closely with the business community to implement the recent tax changes in a manner to ensure as little disruption as possible to normal business operations and that this law encourages 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 we work to implement our new, pro-growth tax code. Thank you for your time and attention.

Sincerely,



Caroline L. Harris

Cc: Charles P. Rettig, Commissioner, Office of the Commissioner, Internal Revenue Service, U.S. Department of the Treasury

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

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

Zachary King, Attorney (Income Tax and Accounting), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Charles Gorham, Attorney (Income Tax and Accounting), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Susie K. Bird, Attorney (Income Tax and Accounting), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Jaime C. Park, Attorney (Income Tax and Accounting), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Sophia L. Wang, Attorney (Income Tax and Accounting), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Kevin M. Jacobs, Attorney (Corporate), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Russell G. Jones, Attorney (Corporate), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

John B. Lovelace, Attorney (Corporate), Office of the Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Meghan M. Howard, Attorney (Passthroughs & Special Industries Division), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

William M. Kostak, Attorney (Passthroughs & Special Industries Division), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Anthony J. McQuillen, Attorney (Passthroughs and Special Industries Division), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Adrienne M. Mikolashek, Attorney (Passthroughs and Special Industries Division), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

James A. Quinn, Attorney (Passthroughs and Special Industries Division), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Angela E. Holland, Attorney (International), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Steven D. Jensen, Attorney (International), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Charles Rioux, Attorney (International), Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Michael Y. Chin, Attorney (Financial Institutions & Products), Office of the Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury