

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

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February 14, 2020

Office of Associate Chief Counsel (International)
Attention: Karen J. Cate, Jeffrey P. Cowan, Jeffrey L. Parry,
Larry R. Pounders, and Suzanne M. Walsh
Internal Revenue Service (I.R.S.)
1111 Constitution Avenue, NW
Washington, DC 20224

CC:PA:LPD:PR
(REG-105495-19)
Room 5203
Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20224

Via Federal eRulemaking Portal

RE: Comments on REG-105495-19: Guidance Related to the Allocation and Apportionment of Deductions and Foreign Taxes, Financial Services Income, Foreign Tax Redeterminations, Foreign Tax Credits under Section 965(g), and Consolidated Groups

Dear Sir or Madam:

The U.S. Chamber of Commerce appreciates the opportunity to provide feedback on REG-105495-19: guidance related to the allocation and apportionment of deductions and foreign taxes, the definition of financial services income, foreign tax redeterminations under section 905(c), the disallowance of certain foreign tax credits under section 965(g), and the application of the foreign tax credit limitation to consolidated groups, as published in the *Federal Register* on December 17, 2019.

The attached chart identifies issues arising under REG-105495-19 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-105495-19.

The Chamber appreciates the opportunity to provide this feedback on REG-105495-19. 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, Deputy Chief Counsel (Technical), Office of the Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury