

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

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September 16, 2020

Office of Chief Counsel
Attention: Jorge M. Oben and Larry R. Pounders
Internal Revenue Service (I.R.S.)
1111 Constitution Avenue, NW
Washington, DC 20224

CC:PA:LPD:PR
(REG-127732-19)
Room 5203
Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20224

Via Federal eRulemaking Portal

**RE: Comments on REG-127732-19: Guidance under Section 954(b)(4) Regarding
Income Subject to a High Rate of Foreign Tax.**

To Whom it May Concern:

The U.S. Chamber of Commerce appreciates the opportunity to provide feedback on REG-127732-19, proposed regulations under the subpart F income and global intangible low-taxed income provisions of the Internal Revenue Code regarding the treatment of certain income that is subject to a high rate of foreign tax, as well as proposed regulations under the information reporting provisions for foreign corporations to facilitate the administration of certain rules in the proposed regulations, as published in the *Federal Register* on July 23, 2020.

The attached chart identifies issues arising under REG-127732-19 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-127732-19.

The Chamber appreciates the opportunity to provide this feedback on REG-127732-19. 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