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## DEPARTMENT OF THE TREASURY

### Internal Revenue Service

#### 26 CFR Part 1

[TD 9866]

RIN 1545–BO54; 1545–BO62

#### Guidance Related to Section 951A (Global Intangible Low-Taxed Income) and Certain Guidance Related to Foreign Tax Credits

##### Correction

In rule document 2019–12437, appearing on pages 29288 through 29370, in the issue of Friday, June 21, 2019 make the following corrections:

1. On page 29337, Table 1 to paragraph (b)(2)(iv)(B) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(iv)(B)

M's subpart F income for Year 1 .....	\$100x
Less: Reduction under section 951(a)(2)(A) for period (1–1 through 5–26) during which M is not a controlled foreign corporation ( $\$100x \times 146/365$ ) .....	40x
Subpart F income for Year 1 as limited by section 951(a)(2)(A) .....	60x
A's pro rata share of subpart F income as determined under section 951(a)(2)(A) ( $0.6 \times \$60x$ ) .....	36x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of M acquired by A:	
(i) Dividend received by B (\$15x), multiplied by a fraction ( $\$100x/\$100x$ ), the numerator of which is the subpart F income of such corporation for the taxable year (\$100x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year ( $\$100x \times (\$100x/\$100x)$ ) .....	15x

TABLE 1 TO PARAGRAPH (b)(2)(iv)(B)—Continued

(ii) B's pro rata share (60%) of the amount which bears the same ratio to the subpart F income of such corporation for the taxable year (\$100x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year ( $146/365$ ) ( $0.6 \times \$100x \times (146/365)$ ) .....	24x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii)) .....	15x
A's pro rata share of subpart F income as determined under section 951(a)(2) .....	21x

2. On page 29338, Table 1 to paragraph (b)(2)(vi)(B)(1) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(vi)(B)(1)

R's subpart F income for Year 1 .....	\$100x
Less: Reduction under section 951(a)(2)(A) for period (1–1 through 3–14) during which R is not a controlled foreign corporation ( $\$100x \times 73/365$ ) .....	20x
Subpart F income for Year 1 as limited by section 951(a)(2)(A) .....	80x
A's pro rata share of subpart F income as determined under section 951(a)(2)(A) ( $0.6 \times \$80x$ ) .....	48x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of R indirectly acquired by A:	
(i) Dividend received by B (\$100x) multiplied by a fraction ( $\$100x/\$400x$ ), the numerator of which is the subpart F income of such corporation for the taxable year (\$100x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year ( $\$400x$ ) ( $\$100x \times (\$100x/\$400x)$ ) .....	25x
(ii) B's pro rata share (60%) of the amount which bears the same ratio to the subpart F income of such corporation for the taxable year (\$100x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year ( $73/365$ ) ( $0.6 \times \$100x \times (73/365)$ ) .....	12x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii)) .....	12x
A's pro rata share of subpart F income as determined under section 951(a)(2) .....	36x

3. On the same page, Table 1 to paragraph (b)(2)(vi)(B)(2) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(vi)(B)(2)

R's tested income for Year 1 .....	\$300x
Less: Reduction under section 951(a)(2)(A) for period (1–1 through 3–14) during which R is not a controlled foreign corporation ( $\$300x \times 73/365$ ) .....	60x
Tested income for Year 1 as limited by under section 951(a)(2)(A) .....	240x
A's pro rata share of tested income as determined under § 1.951A–1(d)(2) ( $0.6 \times \$240x$ ) .....	144x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of R indirectly acquired by A:	
(i) Dividend received by B (\$100x) multiplied by a fraction ( $\$300x/\$400x$ ), the numerator of which is the tested income of such corporation for the taxable year (\$300x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year ( $\$400x$ ) ( $\$100x \times (\$300x/\$400x)$ ) .....	75x
(ii) B's pro rata share (60%) of the amount which bears the same ratio to the tested income of such corporation for the taxable year (\$300x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year ( $73/365$ ) ( $0.6 \times \$300x \times (73/365)$ ) .....	36x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii)) .....	36x
A's pro rata share of tested income under section 951A(e)(1) .....	108x

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## DEPARTMENT OF HOMELAND SECURITY

### Coast Guard

#### 33 CFR Part 165

[Docket Number USCG–2019–0662]

RIN 1625–AA00

#### Safety Zone; Tennessee River, Kentucky Dam Marina Fireworks, Gilbertsville, KY

AGENCY: Coast Guard, DHS.

ACTION: Temporary final rule.

**SUMMARY:** The Coast Guard is establishing a temporary safety zone for certain waters of the Tennessee River.