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JCT overview of GILTI and FDII provisions (sections 250 and 951A)

The Joint Committee on Taxation (JCT) released a presentation that provides an overview of the taxation of global intangible low-taxed income (GILTI) and foreign-derived intangible income (FDII) under sections 250 and 951A. These measures were added to the Code by the tax law enacted in December 2017—Pub. L. No. 115-97—the law that is often referred to as the “Tax Cuts and Jobs Act.”

Read the JCT report: [Overview of the Taxation of Global Intangible Low-Taxed Income and Foreign-Derived Intangible Income: Sections 250 and 951A](#) (May 2019)

Proposed regulations (REG-104464-18) relating to the deduction for FDII and GILTI under section 250 were released in March 2019. Read KPMG’s report of initial impressions about the proposed regulations: [TaxNewsFlash](#)

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