



# TaxNewsFlash

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## KPMG report: Initial impressions of final regulations implementing “anti-hybrid” provisions (sections 245A(e), 267A, and 1503(d))

Final regulations were published on April 8, 2020, in the Federal Register as guidance under sections 245A(e), 267A, and the section 1503(d) dual consolidated loss (DCL) rules.

Read the [final regulations](#) [PDF 501 KB] (56 pages as published in the Federal Register).

The final regulations (T.D. 9896) broadly adopt, with certain revisions and clarifications, the December 2018 version of proposed regulations under such sections.

Read an [April 2020 report](#) [PDF 419 KB] prepared by KPMG LLP that provides early impressions and observations about the final regulations. Further analysis of these regulations will also be forthcoming.

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