



# TaxNewsFlash

United States



No. 2020-554  
September 3, 2020

## KPMG report: Regulations under sections 245A, 951A, 954 (GILTI); treatment of dividends from foreign corporations

Final regulations under sections 245A and 954(c)(6) and proposed regulations under sections 245A and 951A were published in the Federal Register on August 27, 2020.

The final regulations finalize proposed regulations (2019) under sections 245A and 954(c)(6), and also withdraw temporary regulations that accompanied and served as the text of the 2019 proposed regulations.

Read a [September 2020 report](#) [PDF 439 KB] prepared by KPMG LLP that provides a description of the key provisions of the 2020 final and proposed regulations and includes key insights and observations.

The information contained in TaxNewsFlash is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader's knowledge on the matters addressed therein, and is not intended to be applied to any specific reader's particular set of facts. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

KPMG International is a Swiss cooperative that serves as a coordinating entity for a network of independent member firms. KPMG International provides no audit or other client services. Such services are provided solely by member firms in their respective geographic areas. KPMG International and its member firms are legally distinct and separate entities. They are not and nothing contained herein shall be construed to place these entities in the relationship of parents, subsidiaries, agents, partners, or joint venturers. No member firm has any authority (actual, apparent, implied or otherwise) to obligate or bind KPMG International or any member firm in any manner whatsoever.

Direct comments, including requests for subscriptions, to [Washington National Tax](#). For more information, contact KPMG's Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.

To unsubscribe from TaxNewsFlash-United States, reply to [Washington National Tax](#).

[Privacy](#) | [Legal](#)