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KPMG report: Highlights of final BEAT regulations under section 59A

The IRS on September 1, 2020, posted on its website final regulations (T.D. 9910) (the “2020 final regulations”) regarding the section 59A base erosion and anti-abuse tax (BEAT), which applies to payments made by certain large corporate taxpayers to foreign related parties.

The 2020 final regulations finalize guidance provided in proposed regulations (December 2019), and also modify certain guidance provided in final regulations under section 59A that were published in December 2019.

Read a [September 2020 report](#) [PDF 235 KB] providing KPMG’s initial impressions and observations about the 2020 final regulations, as posted on the IRS website on September 1, 2020.

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