



TaxNewsFlash

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Final and proposed regulations released to Federal Register: Foreign tax credit (text of regulations)

The U.S. Treasury Department and IRS today officially released for publication in the Federal Register final regulations (T.D. 9922) and proposed regulations (REG-101657-20) implementing foreign tax credit measures.

- Read the [final regulations](#) [PDF 640 KB] (287 pages)
- Read the [proposed regulations](#) [PDF 641 KB] (298 pages)

The final and proposed regulations are scheduled to be published in the Federal Register on November 12, 2020.

Comparisons against prior IRS versions of regulations

The IRS on September 29, 2020, posted to its website versions of these final and proposed regulations that contain the following statement:

This document is in the process of being submitted to the Office of the Federal Register (OFR) for publication and will be pending placement on public display at the OFR and publication in the Federal Register. The version of the ... regulation released today may vary slightly from the published document if minor editorial changes are made during the OFR review process. The document published in the Federal Register will be the official document.

Read a KPMG report providing initial impressions and observations (based on the versions of the final and proposed regulations posted by the IRS in September 2020): [TaxNewsFlash](#) [PDF 378 KB]

- Read a [computer-generated document \(final regulations\)](#) [PDF 2.7 MB] that compares the version of the final regulations submitted today to the Federal Register against the version posted by the IRS on September 29, 2020.
- Read a [computer-generated document \(proposed regulations\)](#) [PDF 2.7 MB] that compares the version of the proposed regulations submitted today to the Federal Register against the version posted by the IRS on September 29, 2020.

These are unofficial documents produced by KPMG that are intended to show what changes, if any, were made to the regulations prior to being released to the Federal Register for publication. These KPMG documents have not been reviewed for accuracy.

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