



# TaxNewsFlash

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## Final regulations released to Federal Register: Withholding obligations incident to transfers of interests by foreign partners

The U.S. Treasury Department and IRS today released for publication in the Federal Register final regulations (T.D. 9926) concerning the withholding obligations incident to transfers of interests by foreign partners in partnerships that engage in a U.S. trade or business.

Read the [final regulations](#) [PDF 479 KB] (156 pages)

Read an [October 2020 report](#) [PDF 972 KB] prepared by KPMG LLP, providing initial impressions about key provisions addressed by these final regulations (this report based on a version of the final regulations posted by the IRS to its website on October 7, 2020).

### **Comparison against advance version of final regulations**

As noted above, the IRS on October 7, 2020, posted to its website a version of these final regulations that includes the following statement:

*This document will be 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 final regulations 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 [computer-generated document](#) [PDF 1.5 MB] that provides a comparison of the version of the final and temporary regulations submitted today for publication in the Federal Register against the version posted by the IRS on September 21, 2020. This unofficial document was produced by KPMG for the purpose of showing what changes, if any, were made to the regulations prior to being released to the Federal Register for publication. It has not been reviewed for accuracy.

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