



# TaxNewsFlash

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## Final regulations released to Federal Register: Coordinating section 245A and section 951A

The U.S. Treasury Department released for publication in the Federal Register final regulations (T.D. 9934) that coordinate the “extraordinary disposition rule” under section 245A with the “disqualified basis rule” under section 951A—measures concerning the tax treatment of dividends received by U.S. persons and certain controlled foreign corporations (CFCs) pursuant to provisions of the 2017 tax law (Pub. L. No. 115-97) or the law that is often referred to as the “Tax Cuts and Jobs Act” (TCJA).

Read the [final regulations](#) [PDF 326 KB] (55 pages) that are scheduled to be published in the Federal Register on December 1, 2020.

KPMG LLP this week provided an initial analysis about these final regulations, based on a version of the final regulations that the IRS posted to its website on November 20, 2020. Read [TaxNewsFlash](#)

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

As noted above, the IRS on November 20, 2020, posted on 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 1.4 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 November 20, 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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