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Form **8804-W** **Installment Payments of Section 1446 Tax for Partnerships**

OMB No. 1545-0123

(WORKSHEET for the partnership's records—Do Not File)

Department of the Treasury
Internal Revenue Service

For calendar year 2025, or tax year beginning _____, 2025, ending _____, 20_____

2025

Go to www.irs.gov/Form8804W for instructions and the latest information.

Part I **Determination of Installment Payments**

1	Allocable share of effectively connected taxable income (ECTI) expected for the tax year for all foreign partners. See instructions.				
a	Total ECTI allocable to corporate partners	1a			
b	Reduction to line 1a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	1b	()		
c	Reduction to line 1a for certified foreign partner-level items submitted using Form 8804-C	1c	()		
d	Combine lines 1a, 1b, and 1c			1d	
e	Total ECTI allocable to non-corporate partners other than on lines 1i, 1m, and 1q	1e			
f	Reduction to line 1e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	1f	()		
g	Reduction to line 1e for certified foreign partner-level items submitted using Form 8804-C	1g	()		
h	Combine lines 1e, 1f, and 1g			1h	
i	28% rate gain (non-corporate partners only)	1i			
j	Reduction to line 1i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	1j	()		
k	Reduction to line 1i for certified foreign partner-level items submitted using Form 8804-C	1k	()		
l	Combine lines 1i, 1j, and 1k			1l	
m	Unrecaptured section 1250 gain (non-corporate partners only)	1m			
n	Reduction to line 1m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	1n	()		
o	Reduction to line 1m for certified foreign partner-level items submitted using Form 8804-C	1o	()		
p	Combine lines 1m, 1n, and 1o			1p	
q	Adjusted net capital gain (including qualified dividend income and net section 1231 gain) (non-corporate partners only)	1q			
r	Reduction to line 1q for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	1r	()		
s	Reduction to line 1q for certified foreign partner-level items submitted using Form 8804-C	1s	()		
t	Combine lines 1q, 1r, and 1s			1t	
2	Multiply line 1d by 21% (0.21)			2	
3	Multiply line 1h by 37% (0.37)			3	
4	Multiply line 1l by 28% (0.28)			4	
5	Multiply line 1p by 25% (0.25)			5	
6	Multiply line 1t by 20% (0.20)			6	
7	Add lines 2 through 6			7	
	Note: If the aggregate line 7 amount of all foreign partners is less than \$500, the partnership is not required to make estimated tax payments.				
8	Enter the total section 1446 tax that would have been due for 2024, without regard to reductions for certified foreign partner-level items or state and local taxes under Regulations section 1.1446-6(c)(1)(iii), on ECTI allocable to all foreign partners for 2024			8	
	Caution: This line 8 amount only applies if certain conditions are met. See instructions.				
9	Enter the smaller of line 7 or line 8. However, see Caution below. If the line 8 amount does not apply, enter the amount from line 7 on line 9			9	
	Caution: If, for any installment payment, line 7 is smaller than line 8 and you enter that smaller line 7 amount, you will not qualify for the prior year safe harbor when determining any penalty due on Schedule A (Form 8804). See instructions.				
10	Installment due dates. See instructions		(a)	(b)	(c)
11	Enter 25% (0.25) of line 9 in columns (a) through (d). If the partnership uses the annualized income installment method or the adjusted seasonal installment method, then enter the amount from line 43	11			
12	Enter certain amounts paid or credited for each period. See instructions	12			
13	Balance due. Subtract line 12 from line 11	13			

Part II Adjusted Seasonal Installment Method (see instructions)

(Use this method only if the base period percentage for any 6 consecutive months is at least 70%.)

		(a)	(b)	(c)	(d)
		First 3 months	First 5 months	First 8 months	First 11 months
14	Enter ECTI allocable to all foreign partners for the following periods.				
a	Tax year beginning in 2022	14a			
b	Tax year beginning in 2023	14b			
c	Tax year beginning in 2024	14c			
15	Enter ECTI allocable to all foreign partners for each period for the tax year beginning in 2025. See instructions for the treatment of extraordinary items	15			
		First 4 months	First 6 months	First 9 months	Entire year
16	Enter ECTI allocable to all foreign partners for the following periods.				
a	Tax year beginning in 2022	16a			
b	Tax year beginning in 2023	16b			
c	Tax year beginning in 2024	16c			
17	Divide the amount in each column on line 14a by the amount in column (d) on line 16a	17			
18	Divide the amount in each column on line 14b by the amount in column (d) on line 16b	18			
19	Divide the amount in each column on line 14c by the amount in column (d) on line 16c	19			
20	Add lines 17 through 19	20			
21	Divide line 20 by 3.0	21			
22a	Divide line 15 by line 21	22a			
b	Extraordinary items (see instructions)	22b			
c	Combine lines 22a and 22b	22c			
23	Reduction to line 22c amount for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) and for certified foreign partner-level items submitted using Form 8804-C. See instructions	23			
24	Subtract line 23 from line 22c. If zero or less, enter -0-	24			
25a	Multiply the ECTI on line 24 allocable to non-corporate partners by 37% (0.37)	25a			
b	Multiply the ECTI on line 24 allocable to corporate partners by 21% (0.21)	25b			
c	Combine lines 25a and 25b	25c			
26a	Divide the amount in columns (a) through (c) on line 16a by the amount in column (d) on line 16a	26a			
b	Divide the amount in columns (a) through (c) on line 16b by the amount in column (d) on line 16b	26b			
c	Divide the amount in columns (a) through (c) on line 16c by the amount in column (d) on line 16c	26c			
27	Add lines 26a through 26c	27			
28	Divide line 27 by 3.0	28			
29	Multiply the amount in columns (a) through (c) of line 25c by the amount in the corresponding column of line 28. In column (d), enter the amount from line 25c, column (d). See line 37 for instructions	29			

Part III Annualized Income Installment Method (see instructions)

Table with 5 columns: Line number, Description, (a) First ___ months, (b) First ___ months, (c) First ___ months, (d) First ___ months. Rows include annualization periods, ECTI allocations, and tax calculations.

Part IV Required Installments Under Part II and/or Part III

Note: Complete lines 37 through 43 of one column before completing the next column.

		(a)	(b)	(c)	(d)
		1st installment	2nd installment	3rd installment	4th installment
37	If only Part II or Part III is completed, enter the amount in each column from line 29 or line 36. If both parts are completed, enter the smaller of the amounts in each column from line 29 or line 36				
38	Add the amounts in all preceding columns of line 43. See instructions				
39	Adjusted seasonal or annualized income installments. Subtract line 38 from line 37. If zero or less, enter -0-				
40	Enter 25% (0.25) of line 7 in each column				
41	Subtract line 43 of the preceding column from line 42 of the preceding column				
42	Add lines 40 and 41				
43	Required installments. Enter the smaller of line 39 or line 42 here and on line 11				

Form **8804-W** (2025)

ONLY DRAFT
 July 17, 2024
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