



Note: *The draft you are looking for begins on the next page.*

Caution: DRAFT—NOT FOR FILING

This is an early release draft of an IRS tax product, which the IRS is providing for public comment.

You can submit feedback and suggestions via email at lbi.form.8964.comments@irs.gov. The comment period will conclude on November 30, 2026.

The IRS will review all relevant comments received during the comment period before issuing a final version of the product. Form 8964 will become effective for **tax year 2027**.

Forms and instructions are subject to OMB approval before the final version of the product can be officially released.

**SCHEDULE A
(Form 8964)**

(December 2027)

Department of the Treasury
Internal Revenue Service**Suspended Section 987 Loss**

Attach to Form 8964.

Go to www.irs.gov/Form8964 for instructions and the latest information.

OMB No. XXXX-XXXX

Information furnished for tax year beginning , 20 , and ending , 20 .

Complete a separate Schedule A with respect to each recognition grouping. See instructions.

Name of QBU owner Identify the relevant recognition grouping. See instructions. Suspended section 987 loss from the recognition grouping recognized during the tax year

For each QBU, enter all amounts in the QBU owner's functional currency. Attach statement if needed. See instructions.

	(a) Name of QBU	(b) Identifying number or reference ID	(c) Check if QBU is a successor suspended loss QBU	(d) Cumulative suspended section 987 loss at the beginning of the year	(e) Amount that becomes suspended section 987 loss during the year	(f) Total cumulative suspended section 987 loss available for recognition (sum of (d) and (e))
(1)			☐			
(2)			☐			
(3)			☐			
Total						

	(g) Lookback gain amount	(h) Current year gain amount	(i) Total gain (sum of (g) and (h))	(j) Suspended loss recognized under loss-to-the-extent- of-gain rule	(k) Suspended loss recognized under Regulations section 1.987-13(b) through (d)	(l) Suspended loss eliminated under Regulations section 1.987-13(f) or (g)	(m) Cumulative suspended section 987 loss at the end of the year
(1)							
(2)							
(3)							
Total							

For Paperwork Reduction Act Notice, see separate instructions.

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