

INTERNAL REVENUE BULLETIN



HIGHLIGHTS OF THIS ISSUE

Bulletin No. 2017-34
August 21, 2017

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

INCOME TAX

Notice 2017-41, page 211.

Notice 2017-41 extends issuer voluntary reporting for 2017 catastrophic coverage enrolled in through an Exchange. In addition, issuers may rely on this notice to voluntarily report catastrophic plan coverage enrolled in through an Exchange for coverage years after 2017 to the extent final regulations requiring issuer reporting of catastrophic plan coverage enrolled in through an Exchange are not applicable.

Notice 2017-42, page 212.

The notice announces that Treasury and the IRS intend to amend the sections 871(m) regulations to delay the effective/applicability date of certain rules in those final regulations and extends the phase-in period provided in Notice 2016-76, 2016-51 I.R.B. 834, for certain provisions of the section 871(m) regulations.

The IRS Mission

Provide America's taxpayers top-quality service by helping them understand and meet their tax responsibilities and enforce the law with integrity and fairness to all.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations, court decisions, rulings, and procedures must be considered, and Service personnel and others concerned are cautioned

against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.

This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.

This part is divided into two subparts as follows: Subpart A, Tax Conventions and Other Related Items, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.

To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.

This part includes notices of proposed rulemakings, disbarment and suspension lists, and announcements.

The last Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis, and are published in the last Bulletin of each semiannual period.

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Part III. Administrative, Procedural, and Miscellaneous

Information Reporting on Minimum Essential Coverage Under a Catastrophic Plan

Notice 2017-41

PURPOSE

Currently, no reporting is required with respect to coverage under a catastrophic plan (described in § 1302(e) of the Patient Protection and Affordable Care Act, Public Law 111-148, 124 Stat. 119 (2010), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152, 124 Stat. 1029 (2010) (collectively, the Affordable Care Act)) enrolled in through an Affordable Insurance Exchange (Exchange, also called a Marketplace). Guidance applicable for 2015 and 2016 coverage provided that health insurance issuers could voluntarily report coverage under a catastrophic plan enrolled in through an Exchange. This notice extends issuer voluntary reporting for 2017 coverage under a catastrophic plan enrolled in through an Exchange. Accordingly, issuers may, but are not required to, report 2017 coverage under a catastrophic plan enrolled in through an Exchange. Issuers reporting coverage under a catastrophic plan are not subject to information reporting penalties under §§ 6721 and 6722 of the Internal Revenue Code (Code) with respect to returns and statements voluntarily filed and furnished under this notice.

Issuers may rely on this notice to voluntarily report coverage under a catastrophic plan enrolled in through an Exchange for coverage years after 2017 to the extent final regulations requiring issuer reporting of coverage under a catastrophic plan enrolled in through an Exchange are not applicable.

BACKGROUND

Section 1302(e) of the Affordable Care Act provides for catastrophic plans. These plans are minimum essential coverage and qualified health plans, may be offered only in the individual market, and may be enrolled in through an Ex-

change, but taxpayers may not claim the premium tax credit for this coverage. See § 36B(c)(3)(A) of the Code.

Under § 5000A of the Code, individuals who do not qualify for a health coverage exemption have the choice to either maintain minimum essential coverage or make an individual shared responsibility payment.

Section 6055 of the Code and § 1.6055-1(a) of the Income Tax Regulations require all persons providing minimum essential coverage (such as issuers) to file annual information returns with the Internal Revenue Service (IRS) reporting certain information, including information that identifies each covered individual and the months of coverage. Section 6055 and § 1.6055-1(g) also require persons providing minimum essential coverage to furnish a statement to the responsible individual (generally, the person named on an application who enrolls one or more individuals, including him or herself, in minimum essential coverage) containing the same information that is included on the information return required to be filed with the IRS. This reporting allows individuals to establish (and the IRS to verify) that they have minimum essential coverage and, therefore, are not liable for the individual shared responsibility payment under § 5000A.

Section 36B allows a premium tax credit to eligible individuals who enroll or enroll a family member in a qualified health plan (other than a catastrophic plan) through an Exchange. Under § 36B(f)(3), Exchanges must report to the IRS information relating to qualified health plans in which individuals enroll through the Exchange, and furnish annual statements to individuals regarding this information. See also § 1.36B-5(a) and (f) of the Income Tax Regulations. For purposes of reporting by Exchanges under § 36B(f)(3) on coverage in a qualified health plan, the term “qualified health plan” has the same meaning as in § 1301(a) of the Affordable Care Act, except that it does not include a catastrophic plan described in § 1302(e) of the Affordable Care Act. See § 1.36B-1(c). Accordingly, Exchanges are not required

to report coverage under a catastrophic plan enrolled in through the Exchange.

Currently, under the § 6055 regulations, issuers are not required to report any coverage under a plan, including a catastrophic plan, enrolled in through an Exchange. Specifically, § 1.6055-1(d) provides that issuers are not required to report on coverage in a qualified health plan in the individual market enrolled in through an Exchange because that information is generally reported by Exchanges under § 1.36B-5. Thus, currently neither the Exchanges nor issuers are required to report coverage under a catastrophic plan enrolled in through an Exchange.

Effective administration of § 5000A requires reporting of all types of minimum essential coverage, including coverage under catastrophic plans enrolled in through an Exchange. Accordingly, on September 16, 2015, the Department of the Treasury (Treasury Department) and the IRS issued Notice 2015-68, 2015-41 I.R.B. 547, which stated our intent to propose regulations under § 6055 to require issuers of catastrophic plans to report catastrophic plan coverage on Form 1095-B, Health Coverage, beginning with coverage in 2016 (for returns and statements filed and furnished in 2017). Notice 2015-68 also permitted and encouraged issuers to voluntarily report on 2015 catastrophic plan coverage (on returns and statements filed and furnished in 2016). Notice 2015-68 provided that an issuer that voluntarily reports on 2015 catastrophic plan coverage will not be subject to information reporting penalties for these returns and statements.

On August 2, 2016, the Treasury Department and the IRS published proposed regulations under § 6055 that would require issuers of catastrophic plans enrolled in through an Exchange to report catastrophic plan coverage under § 6055 on Form 1095-B. To allow issuers sufficient time to update their systems to comply with required reporting, the rule was proposed to be effective beginning with coverage for 2017 (for returns and statements filed and furnished in 2018). The preamble to the proposed regulations permitted and encouraged issuers to volun-

tarily report on 2016 catastrophic plan coverage (on returns and statements filed and furnished in 2017). In addition, the preamble to the proposed regulations provided that an issuer that voluntarily reports on 2016 catastrophic plan coverage will not be subject to information reporting penalties for these returns and statements. Because these regulations have not been finalized yet, the Treasury Department and the IRS are issuing this notice to allow issuers to continue to voluntarily report catastrophic plan coverage enrolled in through an Exchange and to inform issuers that information reporting penalties will not apply to such voluntary reporting.

GUIDANCE

Consistent with guidance for 2015 and 2016, issuers of catastrophic plan coverage may, but are not required to, report on 2017 catastrophic plan coverage enrolled in through an Exchange (on returns and statements filed and furnished in 2018). In addition, issuers may rely on this notice to voluntarily report catastrophic plan coverage enrolled in through an Exchange for coverage years after 2017 to the extent final regulations requiring issuer reporting of catastrophic plan coverage enrolled in through an Exchange are not applicable. The Treasury Department and the IRS encourage issuers to voluntarily report on catastrophic plan coverage enrolled in through an Exchange.

An issuer that voluntarily reports on catastrophic plan coverage under this notice is not subject to information reporting penalties under §§ 6721 and 6722 with respect to returns and statements reporting such coverage.

FURTHER INFORMATION

The principal author of this notice is Erika C. Reigle of the Office of Associate Chief Counsel (Income Tax & Accounting). For further information regarding this notice contact Erika C. Reigle at (202) 317-7006 (not a toll-free number).

Extension of the Phase-in Period for the Enforcement and Administration of Section 871(m)

Notice 2017-42

I. PURPOSE

This Notice provides taxpayers with additional guidance for complying with the final and temporary regulations under sections 871(m), 1441, 1461, and 1473 of the Internal Revenue Code (the Code) (collectively referred to as the section 871(m) regulations) in 2018¹ and 2019. Specifically, this Notice announces that the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) intend to amend the section 871(m) regulations to delay the effective/applicability date of certain rules in those final regulations. This Notice also extends the phase-in period provided in Notice 2016-76, 2016-51 I.R.B. 834, for certain provisions of the section 871(m) regulations.

The anti-abuse rule provided in § 1.871-15(o) will continue to apply during the phase-in years described in this Notice. As a result, a transaction that would not otherwise be treated as a section 871(m) transaction (including as a result of this Notice) may be a section 871(m) transaction under § 1.871-15(o).

II. BACKGROUND

On September 18, 2015, the **Federal Register** published final regulations and temporary regulations (TD 9734, 80 FR 56866), which finalized a portion of a 2013 notice of proposed rulemaking (78 FR 73128), and introduced new temporary regulations based on comments received with respect to that notice of proposed rulemaking (80 FR 56415) (2015 final regulations and 2015 temporary regulations, respectively).

On December 19, 2016, the Treasury Department and the IRS published Notice 2016-76, 2016-51 I.R.B. 834, which provided for the phased-in application

of certain provisions of the section 871(m) regulations to allow for the orderly implementation of those final regulations.²

On December 30, 2016, the Treasury Department and the IRS released Revenue Procedure 2017-15, 2017-3 I.R.B. 437, which contains the final QI withholding agreement (2017 QI Agreement), including the requirements and obligations applicable to qualified derivatives dealers (QDDs).

On January 24, 2017, the **Federal Register** published final regulations and temporary regulations (TD 9815, 82 FR 8144) (the 2017 regulations), which finalized the 2015 notice of proposed rulemaking (80 FR 56415) that was issued in conjunction with the 2015 temporary regulations. The effective/applicability dates in the 2017 final regulations reflect the phased-in application described in Notice 2016-76. *See* Treas. Reg. § 1.871-15(r)(3).

As described in more detail in sections III through V of this Notice, this Notice extends parts of the phase-in period described in both Notice 2016-76 and Rev. Proc. 2017-15 for one additional year. Dealers, issuers, and other withholding agents have indicated that the phase-in period for delta-one transactions provided in Notice 2016-76 and Rev. Proc. 2017-15 has provided them with valuable time to test and further develop their withholding and reporting systems. Even with the 2017 phase-in period, these market participants have indicated that they would benefit from additional time to refine their systems based on the testing that has occurred in 2017. In addition, dealers, issuers, and other withholding agents continue to design, build, and test new withholding and reporting systems that will enable testing and withholding on non-delta-one transactions, and have requested additional time to complete those systems before being required to comply with the section 871(m) regulations with respect to non-delta-one transactions. Finally, consistent with Executive Order 13777 (82 FR 12285), the Treasury Department and the IRS continue to evaluate the section 871(m) regulations and consider possible

¹Unless otherwise provided, all references to years refer to calendar years.

²The terms used in this Notice have the meanings provided in the section 871(m) regulations.

agency actions that may reduce unnecessary burdens imposed by the regulations.

III. EXTENSION OF THE PHASE-IN YEAR FOR DELTA-ONE AND NON-DELTA-ONE TRANSACTIONS

This section describes the extension to the phased-in application of the section 871(m) regulations to delta-one and non-delta-one transactions. This Notice does not apply to any transaction that is a section 871(m) transaction pursuant to § 1.871-15(d)(1) (providing that before January 1, 2017, a notional principal contract (NPC) is a specified NPC if certain factors are present).

The Treasury Department and the IRS have determined that it is appropriate for taxpayers and withholding agents to have additional time to implement the section 871(m) regulations for non-delta-one transactions, including transactions that are combined transactions under § 1.871-15(n). Therefore, the Treasury Department and the IRS intend to revise the effective/applicability date for § 1.871-15(d)(2) and (e) to provide that these rules will not apply to any payment made with respect to any non-delta-one transaction issued before January 1, 2019.

Notice 2016-76 provides that the IRS will take into account the extent to which the taxpayer or withholding agent made a good faith effort to comply with the section 871(m) regulations with respect to delta-one transactions in 2017 and non-delta-one transactions in 2018 when it enforces the section 871(m) regulations. This Notice extends the periods during which the enforcement standards provided by Notice 2016-76 will apply. Consistent with this extension, the IRS will take into account the extent to which the taxpayer or withholding agent made a good faith effort to comply with the section 871(m) regulations in enforcing the section 871(m) regulations for (1) any delta-one transaction in 2017 and 2018, and (2) any non-delta-one transaction that is a section 871(m) transaction pursuant to § 1.871-15(d)(2) or (e) in 2019.

Similarly, for purposes of the IRS's enforcement and administration of the QDD rules in the section 871(m) regulations and the relevant provisions of the 2017 QI Agreement, this Notice extends through 2018 the period during which the

IRS will take into account the extent to which the QDD made a good faith effort to comply with the section 871(m) regulations and the relevant provisions of the 2017 QI Agreement. In addition, the IRS intends to revise the 2017 QI Agreement to provide that a QDD will be considered to satisfy the obligations that apply specifically to a QDD under that agreement for 2018 provided that the QDD makes a good faith effort to comply with the relevant provisions of the 2017 QI Agreement.

IV. EXTENSION OF THE SIMPLIFIED STANDARD FOR DETERMINING WHETHER TRANSACTIONS ARE COMBINED TRANSACTIONS

Notice 2016-76 provided a simplified standard for withholding agents to determine whether transactions entered into in 2017 are combined transactions. Specifically, a withholding agent is required to combine transactions entered into in 2017 for purposes of determining whether the transactions are section 871(m) transactions only when the transactions are over-the-counter transactions that are priced, marketed, or sold in connection with each other. Withholding agents are not required to combine any transactions that are listed securities entered into in 2017.

This Notice extends the period during which this simplified standard for combined transactions applies to include 2018. Transactions that are entered into in 2017 and 2018 that are combined under this simplified standard will continue to be treated as combined transactions for future years and will not cease to be combined transactions as a result of applying § 1.871-15(n) or disposing of less than all of the potential section 871(m) transactions that are combined under this rule. Transactions that are entered into in 2017 and 2018 that are not combined under this simplified standard will not become combined transactions as a result of applying § 1.871-15(n) to these transactions in future years, unless a reissuance or other event causes the transactions to be retested to determine whether they are section 871(m) transactions. See § 1.871-15(g)(2) (providing that the delta of a potential section 871(m) transaction generally is determined on the earlier of when

the transaction is (1) priced or (2) issued); see also § 1.871-15(a)(6) (defining the term "issue" to include "an issuance as a result of a deemed exchange pursuant to section 1001"). This simplified standard applies only to withholding agents, and does not apply to taxpayers that are long parties to potential section 871(m) transactions.

V. EXTENSION OF PHASE-IN RELIEF FOR QUALIFIED DERIVATIVES DEALERS

Section 1.871-15T(q)(1) of the 2015 temporary regulations provided that when a QDD received a dividend or dividend equivalent payment and the QDD was contractually obligated to make an offsetting dividend equivalent payment on the same underlying security in an amount that was less than the dividend and dividend equivalent amount received, the QDD would be liable for tax under section 871(a) or 881 for the difference. The 2015 final regulations provided that a withholding agent who made a payment of a dividend to a qualified intermediary acting as a QDD was not required to withhold on that payment if the withholding agent reliably associated the payment with a valid qualified intermediary withholding form containing a certification described in § 1.1441-1(e)(3)(ii)(E). See § 1.1441-1(b)(4)(xxii) of the 2015 final regulations.

Comments requested that the Treasury Department and the IRS adopt a different method of determining a QDD's tax liability. Those comments generally requested that this method be based on the QDD's net delta exposure for each underlying security. The Treasury Department and the IRS agreed that the net delta approach was an administrable and accurate method for a QDD to determine its residual exposure to underlying securities, and the 2017 final regulations adopted the net delta exposure method.

In adopting the net delta approach, the Treasury Department and the IRS were concerned that the exemption from withholding on dividends paid to a QDD, when combined with the net delta exposure method, could result in U.S. source dividends escaping U.S. tax completely in certain circumstances. Therefore, the 2017 final regulations revised §§ 1.871-15(q)(1) and 1.1441-1(b)(4)(xxii) to pro-

vide that a QDD remains liable for tax under section 881(a)(1) and subject to withholding under chapters 3 and 4 on dividends. However, to allow taxpayers time to implement the net delta approach, the 2017 QI Agreement and the 2017 final regulations provided that dividends and dividend equivalents received by a QDD in its equity derivatives dealer capacity in 2017 will not be subject to tax under section 881(a)(1) or subject to withholding under chapters 3 and 4.

This Notice announces that the Treasury Department and the IRS intend to amend §§ 1.871-15(q)(1) and (r)(3), and 1.1441-1(b)(4)(xxii)(C) to provide that a QDD will not be subject to tax on dividends and dividend equivalents received in 2017 and 2018 in its equity derivatives dealer capacity or withholding on dividends (including deemed dividends).

Section 4.01(1) of Rev. Proc. 2017-15 provides that a QDD will be required to compute its section 871(m) amount using the net delta approach beginning in 2018. This Notice provides that a QDD will be required to compute its section 871(m)

amount using the net delta approach beginning in 2019.

A QDD will remain liable for tax under section 881(a)(1) on dividends and dividend equivalents that it receives in any capacity other than as an equity derivatives dealer, and on any other U.S. source FDAP payments that it receives (whether or not in its equity derivatives dealer capacity). In addition, a QDD is responsible for withholding on dividend equivalents it pays to a foreign person on a section 871(m) transaction, whether acting in its capacity as an equity derivatives dealer or otherwise.

Finally, section 10.01(C) of the 2017 QI Agreement provides that: “For calendar year 2017, a QDD is not required to perform a periodic review with respect to its QDD activities (as otherwise required by section 10.04 of this Agreement) or provide the factual information specified in Appendix I.” This Notice provides that a QDD is not required to perform a periodic review with respect to its QDD activities for calendar year 2017 and 2018. Note that a QDD must use the same year for the periodic review of its QI activities

and its QDD activities. A QI that is a QDD must choose 2019 or a later year within its periodic review period in which to perform its periodic review unless its applicable periodic review period ends in 2018 or an earlier year.

VI. TAXPAYER RELIANCE

Before the promulgation of the amendments to the section 871(m) regulations and the 2017 QI Agreement, taxpayers may rely on the provisions of this Notice regarding the proposed amendments described in sections III and V. Withholding agents may rely on the simplified standard for determining whether transactions are combined transactions as described in section IV.

VII. DRAFTING INFORMATION

The principal authors of this Notice are Karen Walny and Peter Merkel of the Office of Associate Chief Counsel (International). For further information regarding this Notice, contact Karen Walny or Peter Merkel at (202) 317-6938 (not a toll-free number).

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as “rulings”) that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the new ruling holds that it applies to both A

and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in laws or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in a new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the new ruling does more than restate the sub-

stance of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case, the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.
E.O.—Executive Order.
ER—Employer.

ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contributions Act.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
F.R.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign corporation.
G.C.M.—Chief Counsel’s Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.
PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.
PRS—Partnership.

PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statement of Procedural Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

Numerical Finding List¹

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¹A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2017–01 through 2017–26 is in Internal Revenue Bulletin 2017–26, dated June 27, 2017.

Finding List of Current Actions on Previously Published Items¹

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Amplified by

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Modified by

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Superseded by

Rev. Proc. 2017-43, 2017-31 I.R.B. 153

¹A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2017–01 through 2017–26 is in Internal Revenue Bulletin 2017–26, dated June 27, 2017.

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INTERNAL REVENUE BULLETIN

The Introduction at the beginning of this issue describes the purpose and content of this publication. The weekly Internal Revenue Bulletins are available at www.irs.gov/irb/.

We Welcome Comments About the Internal Revenue Bulletin

If you have comments concerning the format or production of the Internal Revenue Bulletin or suggestions for improving it, we would be pleased to hear from you. You can email us your suggestions or comments through the IRS Internet Home Page (www.irs.gov) or write to the Internal Revenue Service, Publishing Division, IRB Publishing Program Desk, 1111 Constitution Ave. NW, IR-6230 Washington, DC 20224.