

Instructions for Form 8964-ELE

(Rev. December 2025)

Section 987 Elections



Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about developments related to Form 8964-ELE and instructions, such as legislation enacted after they were published, go to [IRS.gov/Form8964ELE](https://www.irs.gov/Form8964ELE).

What's New

On December 11, 2024, final regulations were issued under section 987 of the Internal Revenue Code (TD 10016, 89 FR 100138). Section 987 applies to any taxpayer that has a qualified business unit with a functional currency other than the dollar. The section 987 regulations provide rules for determining and translating taxable income or loss with respect to the QBU. In addition, the regulations provide rules for calculating foreign currency gain or loss under section 987(3), which requires proper adjustments for transfers of property between QBUs of the taxpayer having different functional currencies.

General Instructions

Purpose of Form

Form 8964-ELE is used to make or revoke elections under the section 987 regulations. The form is used to satisfy the reporting requirements of Regulation section 1.987-1(g).

Who Must File

A section 987 election is made or revoked for an owner of a section 987 QBU by the authorized person (each as defined below).

When and Where To File

The authorized person must attach Form 8964-ELE with its original, timely filed (including extensions) return for the tax year for which the elections are made. As explained below, additional requirements apply in certain tax years and for certain elections.

First year in which the section 987 regulations apply.

There are no additional requirements for the first tax year that the section 987 regulations apply to an owner or the first tax year in which the owner or any member of its consolidated group or section 987 electing group is the owner of a section 987 QBU. For that year, section 987 elections are made by attaching Form 8964-ELE to the taxpayer's original, timely filed return.

Subsequent years—current rate election, annual recognition election, or section 988 mark-to-market election. To make or revoke a current rate election,

annual recognition election, or section 988 mark-to-market election for a subsequent year, the authorized person must file Form 8964-ELE before the start of the tax year for which the elections are made. For this purpose, the Form 8964-ELE must be sent to the e-Fax number provided in [Filing Form 8964-ELE](#), later. The authorized person must also attach Form 8964-ELE to its original, timely filed return for the tax year for which the election is made.

Once made, a current rate election, annual recognition election, or section 988 mark-to-market election may not be revoked without the Commissioner's consent for any taxable year beginning within 60 months of the first day of the taxable year for which it was made. Once revoked, a new election may not be made without the Commissioner's consent for any taxable year beginning within 60 months of the first day of the taxable year for which it was revoked.

Subsequent years—other section 987 elections. In subsequent years, an election other than a current rate election, annual recognition election, or section 988 mark-to-market election can be made or revoked only with the Commissioner's consent. Taxpayers can obtain consent to make or revoke an election by requesting a private letter ruling pursuant to Rev. Proc. 2025-1, 2025-1 IRB 1 or its successor. A copy of the ruling must be attached with Form 8964-ELE to the taxpayer's original, timely filed return for the tax year for which the elections are made.

See [Summary of Section 987 Election Filing Requirements, Application of First Year and Subsequent Year Regulations](#), later for additional information on how to make section 987 elections.

Consistency Requirements

In general, a section 987 election is made for an owner and for a taxable year and applies to every section 987 QBU owned by the owner while the election is in effect. Once made, a section 987 election remains in effect until revoked.

In the case of a consolidated group, a section 987 election is made or revoked by a consolidated group and applies to all members of the group. Therefore, the same section 987 elections will be in effect for all members of a consolidated group at all times. If a corporation becomes a member of a consolidated group, it is deemed to make or revoke any section 987 election as necessary to be consistent with the consolidated group. If a corporation ceases to be a member of a consolidated group and does not join another group, its section 987 elections are unaffected by its departure from the group. See Regulations section 1.987-1(g)(2)(i).

In addition, all members of the same section 987 electing group (defined below) must make or revoke section 987 election consistently. If an entity becomes a member of a section 987 electing group (for example, upon formation or acquisition), it is deemed to make or revoke any section 987 election as necessary to be consistent with the other members of the group. See Regulations section 1.987-1(g)(2)(ii).

Definitions

QBU

A qualified business unit (QBU) generally is defined as any separate and clearly identified unit of a trade or business of a taxpayer provided that separate books and records are maintained. See Regulations section 1.989(a)-1(b). For this purpose, a corporation, partnership, trust, estate, or disregarded entity is not itself a QBU, but the activities of such an entity may be a QBU.

Section 987 QBU

A section 987 QBU is an eligible QBU that has a functional currency different from that of its owner. An eligible QBU means a QBU that is not subject to the United States dollar approximate separate transactions method (DASTM) rules of Regulations section 1.985-3.

An owner generally may elect to treat all section 987 QBUs with the same functional currency as a single section 987 QBU.

Owner of a Section 987 QBU (or “QBU Owner”)

The owner of a section 987 QBU (or “QBU owner”) generally is the person who is treated as owning the assets and liabilities of the section 987 QBU for Federal income tax purposes. A section 987 QBU cannot be the owner of another section 987 QBU. For example, if DC (a domestic corporation) owns QBU1 (a section 987 QBU), and QBU1 wholly owns the disregarded entity that owns QBU2 (another section 987 QBU), QBU1 is not the owner of QBU2. Instead, DC is the owner of both QBU1 and QBU2.

The following persons can be the owner of a section 987 QBU.

- A U.S. person.
- A controlled foreign corporation (CFC).
- A U.S. partnership.
- A foreign partnership (FP).

U.S. Person

A U.S. person includes:

- A citizen or resident alien of the United States (see Pub. 519, About Publication 519, U.S. Tax Guide for Aliens, available at [IRS.gov/Pub519](https://www.irs.gov/Pub519), for guidance on determining resident alien status);
- A domestic partnership; and
- A domestic corporation.

Controlled Group

A controlled group means all persons with the relationships to each other specified in section 267(b) or section 707(b).

Authorized Person

With respect to the owner of a section 987 QBU, the “authorized person” is the person that makes section 987 elections for the owner. The authorized person is defined as follows.

- If the owner is a U.S. person, the owner is the authorized person.
- If the owner is a CFC, the controlling domestic shareholders (determined under Regulations section 1.964-1(c)(5)(i)) of the CFC are treated as the authorized person. If there are multiple controlling domestic shareholders, references to the “authorized person” refer to all controlling domestic shareholders acting in concert.
- If the owner is a member of a consolidated group, the election is made by the common parent or other agent for the consolidated group. See Regulations section 1.1502-77.
- If the owner is a partnership, the election is made or revoked by the partnership. For a partnership that is not otherwise required to file a partnership return, see Regulations section 1.6031(a)-1(b)(5) for elections that can only be made by a partnership under section 703.

For more information, see Regulations section 1.987-1(g)(1).

Section 987 Elections

A section 987 election is an election provided in the section 987 regulations. The following elections are section 987 elections.

- Current rate election (Regulations section 1.987-1(d)(2)): An election to treat all items of a section 987 QBU as marked items.
- Annual recognition election (Regulations section 1.987-5(b)(2)): An election to recognize all of the net unrecognized section 987 gain or loss with respect to a section 987 QBU on an annual basis.
- Section 988 mark-to-market election (Regulations section 1.987-3(b)(4)(ii)): An election to recognize section 988 gain or loss of a section 987 QBU under a mark-to-market method of accounting.
- Section 987 grouping election (Regulations section 1.987-1(b)(3)(ii)): An election to treat all section 987 QBUs of the same owner that have the same functional currency as a single section 987 QBU.
- Election to use a spot rate convention (Regulations section 1.987-1(c)(1)(ii)): An election to determine the spot rate using a spot rate convention.
- Election to use the historic inventory method (Regulations section 1.987-3(c)(2)(iv)(B)): An election to account for inventory of a section 987 QBU using historic exchange rates.
- Amortization election – transition rules (Regulations section 1.987-10(e)(5)(ii)(A)): An election to recognize pretransition gain or loss ratably over a period of ten years.
- Small business election – transition rules (Regulations section 1.987-10(e)(7)(iv)): An election for small businesses to treat pretransition gain or loss as zero.
- Section 988 characterization election (Regulations section 1.987-6(b)(2)(i)(C)(1)): An election to characterize passive category section 987 gain or loss of a CFC as foreign currency gain or loss from section 988 transactions for subpart F purposes.

- Recurring transfer group election (Proposed Regulations section 1.987-2(f)(1)): An election to use an average exchange rate to translate assets that are transferred between a section 987 QBU and its owner as part of a recurring transfer group.

Section 987 Electing Group

A section 987 electing group includes a U.S. person and any of the following entities.

- Each CFC in which the U.S. person owns (within the meaning of section 958(a)) more than 50% of the stock (by vote or value).
- Each foreign partnership in which the U.S. person owns (directly or indirectly) more than 50% of the capital and profits interest.

For more information, see Regulations section 1.987-1(g)(2)(ii).

Spot Rate

Spot rate generally means a rate that reflects a fair market rate of exchange available to the public for currency under a spot contract in a free market and involving representative amounts.

An owner may elect to use a spot rate convention that reasonably approximates the spot rate based on the spot rate at the beginning of a reasonable period, the spot rate at the end of a reasonable period, the average of spot rates for a reasonable period, or spot and forward rates for a reasonable period. A reasonable period cannot exceed three months.

Historic Rate

The historic rate for an asset other than inventory generally is the yearly average exchange rate applicable to the year of acquisition. For depreciable or amortizable property, the historic rate may be determined by reference to the date the property is placed in service.

The historic rate for LIFO inventory generally is the yearly average exchange rate applicable to the year in which the inventory's LIFO layer arose. The historic rate for non-LIFO inventory generally is the yearly average exchange rate for the relevant tax year. See Regulations sections 1.987-1(c)(3)(i)(B) and (C).

The historic rate for a liability is the yearly average exchange rate applicable to the year the liability is incurred or assumed.

Yearly Average Exchange Rate

The yearly average exchange rate is a rate that represents an average exchange rate for the tax year (or, if the

section 987 QBU existed for less than the full tax year, the portion of the year during which the section 987 QBU existed) computed under any reasonable method.

Marked Item

In general, a marked item is an asset (marked asset) or liability (marked liability) that is attributable to a section 987 QBU and falls into one of the following categories.

- The item is denominated in, or determined by reference to, the functional currency of the section 987 QBU and would be a section 988 transaction if such item were held or entered into directly by the owner of the section 987 QBU;
- The item is a prepaid expense or a liability for an advance payment of unearned income, in either case having an original term of one year or less on the date the prepaid expense or liability for an advance payment of unearned income arises;
- The item is a section 988 transaction of the section 987 QBU;
- The item is an insurance reserve; or
- The item is a separate account asset.

However, a taxpayer may elect to treat all assets and liabilities that are attributable to a section 987 QBU as marked items (a current rate election).

Historic Item

A historic item is an asset (historic asset) or liability (historic liability) that is attributable to a section 987 QBU and that is not a marked item.

Combination

A combination occurs when the assets and liabilities that were attributable to two or more section 987 QBUs (referred to as the combining QBUs) become attributable to one section 987 QBU (referred to as the combined QBU) and the separate existence of the combining QBUs ceases.

Separation

A separation occurs when the assets and liabilities that were attributable to a section 987 QBU (referred to as the separating QBU) begin to be attributable to two or more section 987 QBUs (referred to as the separated QBUs) and each of the separated QBUs continues to perform a significant portion of the separating QBU's activities immediately after the separation.

Summary of Section 987 Election Filing Requirements, Application of First Year and Subsequent Year Regulations

Section 987 Election Filing Requirements	First Year Regulations Apply	Subsequent Years
Section 987 Current Rate Election under Regulations section 1.987-1(d)(2)	On timely filed return (including extensions)	Before the start of the tax year and on timely filed return (including extensions)
Section 987 Annual Recognition Election under Regulations section 1.987-5(b)(2)	On timely filed return (including extensions)	Before the start of the tax year and on timely filed return (including extensions)
Section 988 Mark-To-Market Election under Regulations section 1.987-3(b)(4)(ii)	On timely filed return (including extensions)	Before the start of the tax year and on timely filed return (including extensions)
Section 987 Grouping Election under Regulations section 1.987-1(b)(3)(ii)	On timely filed return (including extensions)	Only with consent—on timely filed return (including extensions)
Election to use a Spot Rate Convention under Regulations section 1.987-1(c)(1)(ii)	On timely filed return (including extensions)	Only with consent—on timely filed return (including extensions)
Election to use the Historic Inventory Method under Regulations section 1.987-3(c)(2)(iv)(B)	On timely filed return (including extensions)	Only with consent—on timely filed return (including extensions)
Election to Characterize Certain Section 987 Gain/(Loss) as Foreign Currency Gain/(Loss) from Section 988 Transactions under Regulations section 1.987-6(b)(2)(i)(C)(1)	On timely filed return (including extensions)	Only with consent—on timely filed return (including extensions)
Recurring Transfer Group Election under Proposed Regulations section 1.987-2(f)(1)	On timely filed return (including extensions)	Only with consent—on timely filed return (including extensions)
Amortization Election in the Transition Rules under Regulations section 1.987-10(e)(5)(ii)(A)	On timely filed return (including extensions)	N/A (election can only be made in the first year)
Small Business Election in the Transition Rules under Regulations section 1.987-10(e)(7)(iv)	On timely filed return (including extensions)	N/A (election can only be made in the first year)

Filing Form 8964-ELE

For elections that must be filed before the start of the year (for subsequent years after the first year the 987 regulations apply), e-Fax Form 8964-ELE to 833-312-2650 and file a copy with your timely filed return.

Additional Filing Requirements

Form 8964-TRA. An owner of a QBU is required to compute pretransition gain or loss with respect to each section 987 QBU, deferral QBU, and outbound loss QBU under Regulations section 1.987-10(e) by filing Form 8964-TRA, Section 987 Transition Information. See the instructions to Form 8964-TRA, available at [IRS.gov/Form8964TRA](https://www.irs.gov/Form8964TRA).

Form 8858. U.S. persons that operate a foreign branch or own a foreign disregarded entity directly or, in certain circumstances, indirectly or constructively may be required to file Form 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs). For more information, see [IRS.gov/Form8858](https://www.irs.gov/Form8858).

Other Reporting Requirements

Computer-Generated Form 8964-ELE and Schedules

Generally, all computer-generated forms must receive prior approval from the IRS and are subject to an annual review. However, see the Exception below. Requests for approval may be submitted electronically to substituteforms@irs.gov, or requests may be mailed to:

Internal Revenue Service
Attention: Substitute Forms Program
C:DC:TS:CAR:MP:P:TP
1111 Constitution Ave. NW
Room 6554
Washington, DC 20224

Exception. If a computer-generated Form 8964-ELE conforms to and does not deviate from the official form and schedules, they may be filed without prior approval from the IRS.

Important. Be sure to attach the approval letter to Form 8964-ELE. However, if the computer-generated form is identical to the IRS-prescribed form, it does not need to go through the approval process, and an attachment is not necessary.

Every year, the IRS issues a revenue procedure to provide guidance for filers of computer-generated forms. In addition, every year, the IRS issues Pub.1167, General Rules and Specifications for Substitute Forms and Schedules, available at [IRS.gov/Pub1167](https://www.irs.gov/Pub1167), which reprints the most recent applicable revenue procedure.

Corrections to Form 8964-ELE

If you file a Form 8964-ELE that you later determine is incomplete or incorrect, file a corrected Form 8964-ELE with an amended tax return, using the amended return instructions for the return with which you originally filed Form 8964-ELE. Enter “Corrected” at the top of the form and attach a statement identifying the changes.

Specific Instructions

Important. If the information required in a given section exceeds the space provided within that section, **do not** enter “See attached” in the section and then attach all of the information on additional sheets. Instead, complete all entry spaces in the section and attach the remaining information on additional sheets. The additional sheets must conform with the IRS version of that section.

Identifying Information

Annual Accounting Period. Enter, in the space provided below the title of Form 8964-ELE, the annual accounting period of the person furnishing information.

Name and Identifying Number Of The Person Filing Form 8964-ELE. Provide the name and identifying number of the person filing Form 8964-ELE. The filer typically is the authorized person (see *Authorized Person*, earlier). Filers are permitted to enter an EIN or a reference ID number. The reference ID number must meet the requirements set forth below.

If the authorized person is a member of a consolidated group, list the common parent as the person filing the return and enter its identifying information in the spaces provided at the top of page 1 of the form.

Name and Identifying Number Of Authorized Person. If the filer of Form 8964-ELE is not the authorized person, provide the name and identifying/reference ID number of the authorized person.

Name change. If the name of the filer or authorized person changed within the past 3 years, show the prior name(s) in parentheses after the current name.

Reference ID Number.

Note: There is no need to apply to the IRS to request a reference ID number or for permission to use these numbers.

Requirements. The reference ID number must be alphanumeric (defined below) and no special characters or spaces are permitted. The length of a given reference ID number is limited to 50 characters. The same reference ID number must be used consistently from tax year to tax year. If, for any reason, a reference ID number falls out of use, the reference ID number cannot be used again for another filer for purposes of Form 8964-ELE reporting. For these purposes, the term “alphanumeric” means the entry can be alphabetical, numeric, or any combination of the two. Taxpayers cannot enter “FOREIGNUS” or “APPLIED FOR” in a column that requests an EIN or reference ID number. Instead, if an EIN is not available, the filer must enter a reference ID number that uniquely identifies itself.

Address. Include the suite, room, or other unit number after the street address. If the post office does not deliver mail to the street address and the U.S. person has a P.O. box, show the box number instead.

Foreign address. Enter the information in the following order: city, province or state, and country. Follow the country's practice for entering the postal code, if any. Do not abbreviate the country name.

Multiple Owners Or QBUs. If you are the authorized person for multiple QBU owners or for an owner with multiple section 987 QBUs subject to the section 987 elections, check “Yes,” and complete only Part II. Otherwise, check “No,” and complete only Part I.

Part I—Identifying Information Of Owner and QBU

Section A—Owner Information

Line 1—QBU owner information. Complete lines 1a through 1g only if the authorized person is not the QBU owner subject to the section 987 election(s) (for example, if the authorized person is a U.S. corporation that makes section 987 elections on behalf of a CFC that is the owner of a section 987 QBU).

Line 1b—Annual accounting period and tax year of QBU owner. Enter the annual accounting period of the QBU owner for which you are furnishing information.

Line 1d(2)—Reference ID number of QBU owner. Enter the reference ID number of the QBU owner for which you are furnishing information. Filers are permitted to enter both an EIN on line 1d(1) and a reference ID number on line 1d(2).

A “reference ID number” is a number established by or on behalf of the QBU owner that is assigned to the owner. These numbers are used to uniquely identify the QBU owner in order to keep track of the QBU owner from tax year to tax year. The reference ID number must meet the requirements set forth above.

Line 1g—Functional currency of QBU owner. The functional currency of the QBU owner is determined under section 985. Enter the applicable three-character alphabet code for the owner's functional currency using the ISO 4217 standard. These codes are available at [six-group.com/en/products-services/financial-information/data-standards.html#scrollTo=currency-codes](https://www.six-group.com/en/products-services/financial-information/data-standards.html#scrollTo=currency-codes). Click on List One (XLS).

Line 2—Direct owner information. Complete lines 2a through 2d only if the authorized person or QBU owner reported on line 1a is not the direct owner of the section 987 QBUs subject to the election(s) (for example, if the owner is a CFC that owns a section 987 QBU through one or more entities that are disregarded for U.S. tax purposes).

Section B—QBU Information

Enter information for the QBU with respect to which the section 987 election(s) are being made. Attach a statement and list information where applicable.

Line 1—QBU information. Enter the name and identifying number of the QBU (i.e., the name of the relevant disregarded entity, branch, or trade or business).

The identifying number is the EIN if the section 987 QBU is a disregarded entity. Otherwise, enter the EIN of the QBU owner. If the owner is a domestic corporation that is a member of a consolidated group, list the common parent's EIN on line 1b(1).

Filers are permitted to enter both an EIN on line 1b(1) and a reference ID number on line 1b(2). A “reference ID number” is a number established by or on behalf of the QBU that is assigned to the QBU. These numbers are used to uniquely identify the QBU in order to keep track of the QBU from tax year to tax year. The reference ID number must meet the requirements set forth above.

Lines 1d and 1e—QBU country, entity type, and date of organization. Enter on line 1d the country of formation using the two letter country codes (from the list at [IRS.gov/CountryCodes](https://www.irs.gov/CountryCodes)), and the legal form of the QBU's organization. A QBU may be a legal entity disregarded for U.S. tax purposes or a branch of its owner. Provide the full legal designation of the QBU if it is a legal entity. Otherwise, enter “branch.”

Enter on line 1e the date of the QBU's organization (if it is a legal entity) or the date on which the section 987 QBU's trade or business was established.

Line 1f—Effective date as a section 987 QBU. Enter the date on which the QBU became a section 987 QBU (for example, the date on which the QBU adopted a functional currency that is different from its owner, or the QBU was acquired by an owner that has a different functional currency).

If the owner has made a section 987 QBU grouping election under Regulations section 1.987-1(b)(3)(ii), then enter the effective date of the election. If the section 987 QBU is a combined or separated QBU, enter the date on which the combination or separation occurred.

If the section 987 QBU is a successor deferral QBU or successor suspended loss QBU, enter the date of the deferral event as described in Regulations section 1.987-12(g)(1) or the date of the QBU termination described in Regulations section 1.987-13(b) or (c).

Line 1g. Enter on line 1g the two letter country codes (from the list at [IRS.gov/CountryCodes](https://www.irs.gov/CountryCodes)).

Line 1h. Enter on line 1h the six-digit code selected from the list at the end of the instructions for [Form 1120](#).

Line 1i. Enter a brief description of the company's business activity.

Line 1j—Functional currency of QBU. The functional currency of the section 987 QBU is determined under section 985. Enter the applicable three-character alphabet code for the QBU's functional currency using the ISO 4217 standard. These codes are available at [six-group.com/en/products-services/financial-information/data-standards.html#scrollTo=currency-codes](https://www.six-group.com/en/products-services/financial-information/data-standards.html#scrollTo=currency-codes). Click on List One (XLS).

Line 2—QBU's U.S. office or agent. Enter the name and identifying number of the QBU's office or agent located in the United States (if different from the authorized person or the QBU's owner).

The identifying number is the EIN if the agent or office is a legal entity. Otherwise, enter the EIN of the agent or office's owner. If the agent is a domestic corporation that is a member of a consolidated group, list the common parent's EIN on line 2b(1). Filers are permitted to enter both an EIN on line 2b(1) and a reference ID number on

line 2b(2). The reference ID number must meet the requirements set forth above.

Line 2(d)—Name and address of person(s) with custody of QBU books and records. Enter the name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the QBU and, if different, the location of the books and records.

Part II—Listing of QBUs for Authorized Persons With Multiple Owners and/or Multiple QBUs

Authorized persons making section 987 elections for multiple QBU owners and/or with respect to multiple section 987 QBUs must use Part II, Sections A and B to provide information for each QBU owner and section 987 QBU subject to the section 987 elections. Attach statement where necessary to furnish information.

Section A—Information of QBUs Subject to the Consistency Requirements of Regulations

Section 1.987-1(g)(2)

If the authorized person makes section 987 elections for an owner with multiple section 987 QBUs or for multiple owners that are subject to the consistency rules of Regulations section 1.987-1(g)(2), complete Section A and attach statements where necessary.

Line 1. If the authorized person is a U.S. person (other than a partnership) or a domestic partnership, check “Yes” in the appropriate line and attach a statement listing all section 987 QBUs owned by the authorized person.

Line 2. If the authorized person owns (directly or indirectly, by vote or value) more than 50% of the stock of one or more CFCs that own a section 987 QBU, attach a statement listing all section 987 QBUs owned by the CFC(s).

Line 3. If the authorized person owns (directly or indirectly) more than 50% of the capital and profits interests in one or more foreign partnerships, which in turn own one or more section 987 QBUs, attach a statement listing all section 987 QBUs owned by the foreign partnerships.

Section B—Information of QBUs Not Subject to the Consistency Requirements of Regulations

Section 1.987-1(g)(2)

Line 1. Attach a statement listing all QBU owners and section 987 QBUs for which the authorized person is making or revoking the section 987 elections, other than the QBU owners and section 987 QBUs listed in Section A.

Part III—Type of Election

In general, a section 987 election may not be made or revoked without the consent of the Commissioner, except for initial year elections and certain elections eligible to be made or revoked without the consent requirement. See [When and Where To File](#), earlier.

An authorized person who files Form 8964-ELE in accordance with these instructions is deemed to satisfy

the requirement to file a statement described in Regulations section 1.987-1(g)(3)(i).

Check the box corresponding to the election(s) you wish to make or revoke. In addition, check the box next to any election that was made in a previous year and continues to be in effect.

For each election that is being made or revoked, provide the EIN of the authorized person that is making or revoking the election. For each election that was made in a previous year and continues to be in effect, provide the EIN of the authorized person that made the original election.

The effective date of an election is the first day of the first tax year to which the election applies under Regulations section 1.987-1(g). The effective date of a revocation of an election is the first day of the first tax year in which the election ceases to apply.

Line 5—Election to use Spot Rate Convention. If you are making an election to use a spot rate convention, attach a statement describing the spot rate convention.

Part IV—Other Information

Line 1—Name and telephone number of the representative of authorized person. Enter the name, title, and phone number of the authorized person's representative with power of attorney to respond to IRS inquiries. See Form 2848, Power of Attorney and Declaration of Representative, available at [IRS.gov/Form2848](https://www.irs.gov/Form2848).

Line 2. If the authorized person is making an election for a CFC, provide the name, EIN, and the percentage of voting stock of the CFC's controlling domestic shareholder(s) determined under Regulations section 1.964-1(c)(5)(i). Attach statement if additional space is required.

Note: If the name of the authorized person, CFCs, or controlling domestic shareholders filing the return whose activities are being reported changed within the past 3 years, show the prior name(s) in parentheses after the current name.

Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by Internal Revenue Code section 6103.

The estimated burden for taxpayers filing this form is approved under OMB control number 1545-0123.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form and related schedule simpler, we would be happy to hear from you. You can send us comments through IRS.gov/FormComments. Or, you can write to the Internal Revenue Service, Tax Forms and Publications Division, 1111 Constitution Ave. NW, IR-6526, Washington, DC 20224. **Do not** send the tax form to this address. Instead, see [Where To File](#), earlier, near the beginning of the instructions.
