



LB&I International Practice Service Transaction Unit

IPS Level	Number	Title	UIL Code	Number
Shelf	N/A	Business Outbound	–	–
Volume	2	Deferral Planning	Level 1 UIL	9412
Part	2.1	Foreign Base Company Sales Issues	Level 2 UIL	9412.01
Chapter	2.1.2	Application of Branch Rules	Level 3 UIL	9412.01-02
Sub-Chapter	2.1.2.1	Sales Branch	–	–

Unit Name	Branch Sales to Unrelated Parties of Products Manufactured by CFC
------------------	---

Document Control Number (DCN)	DPL/9412.01_08(2015)
Date of Last Update	08/03/15

Note: This document is not an official pronouncement of law, and cannot be used, cited or relied upon as such. Further, this document may not contain a comprehensive discussion of all pertinent issues or law or the IRS's interpretation of current law.

Table of Contents

(View this PowerPoint in "Presentation View" to click on the links below)

General Overview

- [Issue and Transaction Overview](#)
- [Transaction and Fact Pattern](#)
- [Effective Tax Rate Overview](#)

[Summary of Potential Issues](#)

[Audit Steps](#)

[Training and Additional Resources](#)

[Glossary of Terms and Acronyms](#)

[Index of Related Issues](#)

Issue and Transaction Overview

Branch Sales to Unrelated Parties of Products Manufactured by CFC

When a controlled foreign corporation (“CFC”) sells outside its country of incorporation by or through a branch (or similar establishment), **and** the use of the branch has *substantially the same tax effect* (SSTE) as if the branch were a wholly-owned subsidiary deriving the income, then the sales branch and the remainder of the CFC will be treated (for purposes of the foreign base company sales income, or “FBCSI,” rules) as separate corporations. Furthermore, the sales made by or through the branch will be treated as made *on behalf of* the remainder of the CFC, which generally results in FBCSI to the CFC. The term “branch or similar establishment” is not defined in the Code or the Regulations.

The mere existence of a branch outside the CFC’s country of incorporation does not necessarily result in FBCSI to the CFC. The *tax rate disparity (TRD) test* must be applied in order to determine whether the use of the branch has SSTE as if it were a separate corporation. The TRD test compares the hypothetical effective rate of tax (ERT) with respect to the hypothetical net sales income computed under the laws of the manufacturing jurisdiction (i.e., “hypothetical tax base”, discussed later in the unit) to the actual ERT with respect to that hypothetical tax base. If there is TRD (as discussed below), then the use of the branch is said to have SSTE as if it were a separate corporation, and the branch and the remainder of the CFC will be treated as separate corporations for purposes of determining the CFC’s FBCSI.

Generally, under the TRD test, a *sales branch* and the remainder of the CFC will be treated as separate corporations if the actual ERT with respect to the hypothetical tax base is less than 90% of, and at least 5 percentage points below, the hypothetical ERT that would apply to that base *in the CFC’s country of incorporation*. If there is TRD, then the branch and the remainder of the CFC are treated as separate corporations, in which case the sales made by or through the branch will be treated as made on behalf of the remainder of the CFC, and the CFC will generally have FBCSI.

Note: this unit discusses the application of the branch rules to a CFC with one or more sales branches. The application of the branch rules to a CFC with one or more manufacturing branches is beyond the scope of this unit.

Issue and Transaction Overview (cont'd)

Branch Sales to Unrelated Parties of Products Manufactured by CFC



DECISION POINT: Under the “priority of application” (Treas. Reg. 1.954-3(b)(2)(ii)(f)) and “comparison with ordinary treatment” (Treas. Reg. 1.954-3(b)(2)(ii)(e)) rules, if income *is* FBCSI without regard to the branch rules, or if the income would *not* be FBCSI if derived by a separate CFC, the branch rules *are not invoked*. Stated another way, examiners must apply IRC 954(d)(1) first to determine whether the CFC’s income is FBCSI without treating the branch as a separate corporation (and if so, examiners should *not* apply the branch rules), and examiners should not apply the branch rules where it is clear that the income would not be FBCSI if the branch were a separate CFC.

Note: in the example in this unit, the statutory rates are assumed to be the same as the ERT for illustrative purposes only. In an actual exam fact pattern, the statutory rate will rarely equal the ERT due to variations among tax jurisdictions in exclusions, deductions, credits, and other tax attributes. See AM2015-002 for information on the computation of the ERT.

Transaction and Fact Pattern

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Diagram of Transaction	Facts
<p>The diagram illustrates the ownership and sales structure. At the top is USP, which owns 100% of CFC1. CFC1, located in Country A with a 15% tax rate, manufactures Products X and Y. CFC1 has two selling branches: DE1 in Country B (0% tax rate) and DE2 in Country C (20% tax rate). Both DE1 and DE2 are 100% owned by CFC1. DE1 sells Product X to unrelated parties in Country D, and DE2 sells Product Y to unrelated parties in Country E.</p>	<ul style="list-style-type: none"> ▪ CFC1 is incorporated in Country A, where the tax rate is 15%. ▪ DE1 is a hybrid entity (incorporated in Country B, where the tax rate is 0%, and disregarded for US tax purposes). ▪ DE2 is a hybrid entity (incorporated in Country C, where the tax rate is 20%, and disregarded for US tax purposes). ▪ CFC1 manufactures Products X and Y from raw materials purchased from unrelated suppliers (DE1 and DE2 do not perform any manufacturing activities). ▪ DE1 sells Product X to unrelated third parties in Country D (i.e. DE1 is a <i>selling branch</i> of CFC1). ▪ DE2 sells Product Y to unrelated third parties in Country E (i.e. DE2 is a <i>selling branch</i> of CFC1). <p>Note: If CFC1 derived income from its own sales of Products X and Y, such income would <i>not</i> be FBCSI because CFC1 would qualify for the “CFC manufacturing exception” (not covered in this unit). This is true <i>even if</i> the use of DE1 or DE2 has SSTE as if they are separate corporations.</p>

Effective Tax Rate Overview

Branch Sales to Unrelated Parties of Products Manufactured by CFC

ETR of Company

- The examiner should review the company's audited financial statements to determine the ETR of the worldwide group for the years at issue and compare it to other companies in the same industry. The examiner should look for the total permanently reinvested offshore income (PRI). Note that the ETR for financial statement purposes is not the same as the actual or hypothetical ETR for purposes of the sales branch rule covered in this unit.
- The examiner will also have to determine the tax rates for the CFC and each of its branches including disregarded entities.
- The tax rate in Country A (15%) is lower than the US rate (35%), so profits moved to Country A are taxed at a rate that is 20 percentage points lower than the US rate.
- The tax rate in Country B (0%) is lower than the Country A rate (15%), so profits on Product X moved to Country B are taxed at a rate that is 15 percentage points lower than the Country A rate.

ETR Impact of Adjustment

- Assuming (1) the E&P is PRI under APB 23 (now codified as ASC 740-30) and (2) the income of the CFCs is not subject to taxation under subpart F, the corporate group is able to reduce its worldwide ETR by shifting profits outside the US (or from a higher-tax foreign jurisdiction to a lower-tax foreign jurisdiction). This reduction in worldwide ETR is important for financial reporting purposes.
- An inclusion of subpart F income may increase the financial income tax expense of USP, resulting in higher ETR. However, Foreign Tax Credits (FTCs) may offset the increase in ETR if the FTCs had been an unrecognized deferred tax asset (e.g. a valuation allowance had prevented excess FTC carryovers from being recognized in financial statements as a deferred tax asset).

Summary of Potential Issues

Branch Sales to Unrelated Parties of Products Manufactured by CFC

<u>Issue 1</u>	Whether DE1 and the remainder of CFC1 are treated as separate corporations under the branch rules.
<u>Issue 2</u>	Whether CFC1 has FBCSI as a result of DE1's sales of Product X.
<u>Issue 3</u>	Whether DE2 and the remainder of CFC1 are treated as separate corporations under the branch rules.
<u>Issue 4</u>	Whether CFC1 has FBCSI as a result of DE2's sales of Product Y.

All Issues, Step 1: Initial Factual Development

Branch Sales to Unrelated Parties of Products Manufactured by CFC

The rules for FBCSI are intended to prevent a US shareholder from using a CFC to shift sales income (1) from the US to foreign jurisdictions, or (2) from a high-tax country to a low-tax country. Section 954(d)(2) addresses the situation in which a US shareholder of a CFC attempts to avoid the FBCSI rules by shifting the sales income to a lower-tax country through the use of a branch instead of a separate CFC.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Verify whether CFC1, DE1 or DE2 derive income from the purchase and sale of personal property, and determine where the property is manufactured and where the property is sold for use/consumption. ▪ Determine whether CFC1 sells by or through DE1 or DE2. 	<ul style="list-style-type: none"> ▪ Branch Decision Tree ▪ Consolidating financial statements ▪ Form 5471 for CFC1 ▪ Form 8858 for DE1 and DE2 ▪ Transfer pricing studies, if any, prepared for foreign country reporting ▪ Subpart F Functional Analysis (or similar documentation), if any ▪ Global Tax and Legal Organizational Charts ▪ Auditor's Workbench (formerly known as International Information Returns) 	

Issue 1, Step 2: Review Potential Issues

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 1

Whether DE1 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<p>When a CFC sells by or through a branch or similar establishment outside the CFC's country of incorporation, the sales branch and the remainder of the CFC will be treated as separate corporations if there is TRD. Under the sales branch rules, the TRD test compares the <i>actual ERT</i> with respect to the <i>hypothetical tax base</i> to the <i>hypothetical ERT</i> with respect to that base.</p> <p>Computing the ERTs involves determining the <i>TRD Gross Income</i>, the actual tax with respect to that income, the <i>hypothetical tax base</i>, and the hypothetical tax with respect to that base. Finally, the actual and hypothetical tax are divided by the <i>hypothetical tax base</i> and the resulting ERTs are compared.</p>	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.954-3(b)(1)(i) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) ▪ Treas. Reg. 1.954-3(b)(4) <i>Ex. 1</i> 	

Issue 1, Step 2: Review Potential Issues (cont'd)

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 1

Whether DE1 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<ol style="list-style-type: none"> 1. Determine <i>TRD Gross income</i>, which, in the case of a sales branch, is the branch's gross income derived in connection with the sale of the property in question. 2. Determine the <i>actual tax</i> with respect to the TRD Gross Income (if necessary, determined separately from taxes on other income of the sales branch). 3. Determine the <i>hypothetical tax base</i>, which is TRD Gross Income reduced by any exclusions and deductions that would be permitted in the manufacturing country if the income were derived from sources in that country through a permanent establishment (PE) there. 4. Multiply the hypothetical tax base by the applicable marginal tax rate(s) in the manufacturing jurisdiction to determine the <i>hypothetical tax</i>. 5. Divide the actual tax by the hypothetical tax base to compute the actual ERT; divide the hypothetical tax by the hypothetical tax base to compute the hypothetical ERT; compare these ERTs. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.954-3(b)(1)(i) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) ▪ Treas. Reg. 1.954-3(b)(4) <i>Ex. 1</i> ▪ AM2015-002 ▪ BNA Portfolios "Business Operations Abroad" ▪ Tax research platform at www.ibfd.org (information regarding tax rates in various countries) 	

Issue 1, Step 3: Additional Factual Development

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 1

Whether DE1 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<p>Compare the <i>actual ERT</i> in Country B to the <i>hypothetical ERT</i> in Country A. If the actual ERT is less than 90% of, and at least 5 percentage points below, the hypothetical ERT, then there is TRD, and DE1 and the remainder of CFC1 are treated as separate corporations for purposes of determining FBCSI.</p>	<ul style="list-style-type: none"> ▪ Income tax returns filed by CFC1 and DE1 in Country A and B ▪ Transaction contracts/agreements ▪ Product Flows and Transaction Flowcharts ▪ Diagram, analysis or presentation regarding supply chain (including any supply chain agreements) ▪ Many US companies request a tax package, organizer, or other similar information from the CFC in order to prepare the 5471s and 8858s. Request a copy and review for further details of the facts. 	

Issue 1, Step 4: Develop Arguments

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 1

Whether DE1 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
The factual development in this transaction indicates that the actual ERT with respect to the hypothetical tax base is less than 90% of, and at least 5 percentage points below, the hypothetical ERT with respect to that base. This means that there is TRD. As a result, DE1 and the remainder of CFC1 are treated as separate corporations for purposes of determining CFC1's FBCSI.	▪ Treas. Reg. 1.954-3(b)(1)(i)	

Issue 2, Step 2: Review Potential Issues

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 2

Whether CFC1 has FBCSI as a result of DE1's sales of Product X.

Fact Element	Resources	6103 Protected Resources
<p>FBCSI (a type of subpart F income) arises when all of the following conditions are met.</p> <ol style="list-style-type: none"> 1. A CFC buys/sells personal property from/to (or on behalf of) a <i>related person</i>, 2. The property is manufactured, produced, constructed, grown, or extracted <i>outside</i> the CFC's country of incorporation, and 3. The property is purchased/sold for use, consumption or disposition <i>outside</i> the CFC's country of incorporation. <p>The income from the sale of property by the CFC is FBCSI unless an exception applies. The US shareholder(s) of the CFC may have a subpart F inclusion.</p> <p>Note: as discussed earlier, even if DE1 and CFC1 are treated as separate corporations under the branch rules, CFC1 would not have FBCSI with respect to its own sales of Product X, if any, because it would qualify for the "CFC manufacturing exception". This issue focuses on DE1's <i>sales</i> of Product X to unrelated third parties.</p>	<ul style="list-style-type: none"> ▪ IRC 954(d) 	

Issue 2, Step 3: Additional Factual Development

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 2

Whether CFC1 has FBCSI as a result of DE1's sales of Product X.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none">Verify whether the sale of Product X by DE1 falls within the definition of FBCSI (e.g. whether DE1 sells, on behalf of a related party, property manufactured <u>outside</u> Country B for use <u>outside</u> Country B).	<ul style="list-style-type: none">Consider requesting schedules of sales by destination and copies of local country Value Added Tax (VAT) returns to verify place of manufacture, sale, use or consumption.	

Issue 2, Step 4: Develop Arguments

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 2

Whether CFC1 has FBCSI as a result of DE1's sales of Product X.

Fact Element	Resources	6103 Protected Resources
<p>The factual development in this transaction indicates that DE1 sells Product X <i>on behalf of</i> CFC1 outside Country B. Although DE1 sells to <i>unrelated</i> parties, it does so <i>on behalf of</i> a related party. Consequently, DE1's income from the sale of Product X outside Country B is FBCSI, resulting in a subpart F inclusion to USP under IRC 951 (assuming there are sufficient E&P).</p>	<ul style="list-style-type: none"> ▪ IRC 954(d) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) 	

Issue 3, Step 2: Review Potential Issues

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 3

Whether DE2 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<p>When a CFC sells by or through a branch or a similar establishment outside the CFC's country of incorporation, the sales branch and the remainder of the CFC will be treated as separate corporations if there is TRD resulting from the use of the branch. Under the sales branch rules, the TRD test compares the actual and hypothetical ERT with respect to the hypothetical tax base.</p> <p>Computing the ERTs involves determining the <i>TRD Gross Income</i>, the actual tax with respect to that income, the <i>hypothetical tax base</i>, and the hypothetical tax with respect to that base. Finally, the actual and hypothetical tax are divided by the <i>hypothetical tax base</i> and the resulting ERTs are compared.</p>	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.954-3(b)(1)(i) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) ▪ Treas. Reg. 1.954-3(b)(4) <i>Ex. 1</i> 	

Issue 3, Step 2: Review Potential Issues (cont'd)

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 3

Whether DE2 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<ol style="list-style-type: none"> 1. Determine <i>TRD Gross income</i>, which, in the case of a sales branch, is the branch's gross income derived in connection with the sale of property in question. 2. Determine the <i>actual tax</i> with respect to the TRD Gross Income (if necessary, determined separately from taxes on other income of the sales branch). 3. Determine the <i>hypothetical tax base</i>, which is TRD Gross Income reduced by any exclusions and deductions that would be permitted in the manufacturing country if the income were derived from sources in that country through a permanent establishment (PE) there. 4. Multiply the hypothetical tax base by the applicable marginal tax rate(s) in the manufacturing jurisdiction to determine the <i>hypothetical tax</i>. 5. Divide the actual tax by the hypothetical tax base to compute the actual ERT; divide the hypothetical tax by the hypothetical tax base to compute the hypothetical ERT; compare these ERTs. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.954-3(b)(1)(i) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) ▪ Treas. Reg. 1.954-3(b)(4) <i>Ex. 1</i> ▪ AM2015-002 ▪ BNA Portfolios "Business Operations Abroad" ▪ Tax research platform at www.ibfd.org (information regarding tax rates in various countries) 	

Issue 3, Step 3: Additional Factual Development

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 3

Whether DE2 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<p>Compare the <i>actual ERT</i> in Country C to the <i>hypothetical ERT</i> in Country A. If the actual ERT is less than 90% of, and at least 5 percentage points below, the hypothetical ERT, then there is TRD, and DE2 and the remainder of CFC1 are treated as separate corporations for purposes of determining CFC1's FBCSI.</p>	<ul style="list-style-type: none"> ▪ Income tax returns filed by CFC1 and DE2 in Country A and C ▪ Transaction contracts/agreements ▪ Product Flows and Transaction Flowcharts ▪ Diagram, analysis or presentation regarding supply chain (including any supply chain agreements) ▪ Many US companies request a tax package, organizer, or other similar information from the CFC in order to prepare the 5471s and 8858s. Request a copy and review for further details of the facts. 	

Issue 3, Step 4: Develop Arguments

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 3

Whether DE2 and the remainder of CFC1 are treated as separate corporations under the branch rules.

Fact Element	Resources	6103 Protected Resources
<p>The factual development in this transaction indicates that the actual ERT with respect to the hypothetical tax base is not less than 90% of, and at least 5 percentage points below, the hypothetical ERT with respect to that base (i.e. there is <i>no</i> TRD). As a result, DE2 and the remainder of CFC1 are not treated as separate corporations for purposes of determining CFC1's FBCSI.</p>	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.954-3(b)(1)(i) ▪ Treas. Reg. 1.954-3(b)(2)(ii)(b) 	

Issue 4, Step 2: Review Potential Issues

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 4

Whether CFC1 has FBCSI as a result of DE2's sales of Product Y.

Fact Element	Resources	6103 Protected Resources
<p>FBCSI (a type of subpart F income) arises when all of the following conditions are met.</p> <ol style="list-style-type: none"> 1. A CFC buys/sells personal property from/to (or on behalf of) a <i>related person</i>, 2. The property is manufactured, produced, constructed, grown, or extracted <i>outside</i> the CFC's country of incorporation, and 3. The property is purchased/sold for use, consumption or disposition <i>outside</i> the CFC's country of incorporation. <p>The income from the sale of property by the CFC is FBCSI unless an exception applies. The US shareholder(s) of the CFC may have a subpart F inclusion.</p> <p>Note: as discussed earlier, even if DE2 and CFC1 are treated as separate corporations under the branch rules, CFC1 would not have FBCSI with respect to its own sales of Product Y, if any, because it would qualify for the "CFC manufacturing exception". This issue focuses on DE2's sales of Product Y to unrelated third parties.</p>	<ul style="list-style-type: none"> ▪ IRC 954(d) 	

Issue 4, Step 3: Additional Factual Development

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 4

Whether CFC1 has FBCSI as a result of DE2's sales of Product Y.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none">Determine whether the sale of Product Y by DE2 falls within the definition of FBCSI (e.g. whether DE2 sells, on behalf of a related party, property manufactured <u>outside</u> Country C for use <u>outside</u> Country C).	<ul style="list-style-type: none">Consider requesting schedules of sales by destination and copies of local country Value Added Tax (VAT) returns to verify place of manufacture, sale, use or consumption.	

Issue 4, Step 4: Develop Arguments

Branch Sales to Unrelated Parties of Products Manufactured by CFC

Issue 4

Whether CFC1 has FBCSI as a result of DE2's sales of Product Y.

Fact Element	Resources	6103 Protected Resources
<p>The factual development in this transaction indicates that CFC1 and DE2 are viewed as a single economic unit (i.e. DE2 and the remainder of CFC1 are not treated as separate corporations as outlined in Issue 3). Consequently, CFC1 would <i>not</i> have FBCSI from DE2's sales of Product Y because it qualifies for the CFC manufacturing exception from FBCSI under Treas. Reg.1.954-3(a)(4).</p> <p>Note: since CFC1 qualifies for the manufacturing exception (because CFC1 and DE2 are not separate corporations under the branch rules) it is irrelevant whether Product Y is sold to related or unrelated parties and/or where Product Y is ultimately sold for use or consumption.</p>	<ul style="list-style-type: none"> ▪ IRC 954(d) 	

Training and Additional Resources

Chapter 2.1.2 Application of Branch Rules		
Type of Resource	Description(s) and/or Instructions for Accessing	References
CENTRA sessions	<ul style="list-style-type: none"> ▪ CLE Centra - Subpart F 20130930 ▪ Training - FY 2011 CPE "Live" Recordings ▪ Centra Subpart F June 2010 ▪ Branch Rules for FBCSI CPE Centra March 2015 	<ul style="list-style-type: none"> ▪ Discussion of branches is included in the Centra sessions linked at left.
White Papers / Guidance	<ul style="list-style-type: none"> ▪ Westlaw subscription 	<ul style="list-style-type: none"> ▪ Bittker & Lokken 69.5.5 ▪ TMFEDPORT No. 928-3rd VII. H. Foreign Branch of CFC Treated as Separate Corporation ▪ TMFEDPORT No. 6380-1st IV. D. 2. a. (3) FBCSI The Branch Rule

Glossary of Terms and Acronyms

Acronym	Definition
CFC	Controlled foreign corporation
DE	Disregarded entity
E&P	Earnings & profits
ERT	Effective rate of tax
ETR	Effective tax rate
FBCSI	Foreign base company sales income
FTC	Foreign tax credit
IIR	International Information Return
PE	Permanent establishment
PRI	Permanently reinvested (offshore) income
SSTE	Substantially the Same Tax Effect (as a separate corporation)
TRD	Tax rate disparity
USP	United States parent

Index of Related Issues

Issue	Associated UIL(s)	References
Subpart F Overview	9412	▪ Subpart F Overview DPL/CU/V_2_01(2013)
Manufacturing branches	9412.01-02	▪ Sale by CFC to Unrelated Parties of Products Manufactured by Branch DPL/9412.01_06(2015)
Branch rules for FBCSI	9412.01-02	▪ Branch Rules for FBCSI DPL/CU/C_2.1.2_07(2015)