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From:

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To:

Cc:

Subject: FW: Transition Rules for §6662(b)(6)

Section 6662(b)(6) is effective for underpayments attributable to transactions entered into after 3/30/10. We don't have any regs out for that yet, but it would be consistent with how the current regs generally treat carrybacks to treat an underpayment in a carryback year as attributable to the transaction giving rise to the loss in the source year. See 1.6662-3(d), 1.6662-4(c), 1.6662-5(c)