

112TH CONGRESS
1ST SESSION

H. R. 2735

To amend the Internal Revenue Code of 1986 to make permanent the look-through treatment of payments between related controlled foreign corporations.

IN THE HOUSE OF REPRESENTATIVES

AUGUST 1, 2011

Mr. BOUSTANY (for himself and Mr. KIND) introduced the following bill;
which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to make permanent the look-through treatment of payments between related controlled foreign corporations.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. LOOK-THROUGH TREATMENT OF PAYMENTS**

4 **BETWEEN RELATED CONTROLLED FOREIGN**

5 **CORPORATIONS MADE PERMANENT.**

6 (a) IN GENERAL.—Subparagraph (C) of section
7 954(c)(6) of the Internal Revenue Code of 1986 is amend-
8 ed by striking “and before January 1, 2012,”.

1 (b) EFFECTIVE DATE.—The amendment made by
2 this section shall apply to taxable years of foreign corpora-
3 tions beginning after December 31, 2011, and to taxable
4 years of United States shareholders with or within which
5 such taxable years of foreign corporations end.

○