Form 8858 (Rev. 12-2018)

Schedule G Other Information (continued)

Scn	edule G Other Information (continued)		
		Yes	No
6a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as a		
	base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from		
	a foreign person which is a related party of the taxpayer? See instructions. If "Yes," complete lines 6b		
	and 6c		
b	Enter the total amount of the base erosion payments \$		
С	Enter the total amount of the base erosion tax benefit \$		
7a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base		
	erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a		
	foreign person which is a related party of the taxpayer? See instructions. If "Yes," complete lines 7b and 7c		
b	Enter the total amount of the base erosion payments \$		
С	Enter the total amount of the base erosion tax benefit \$		
8	Is the FDE or FB a qualified business unit as defined in section 989(a)?		
9	Answer the following question only if the tax owner of the FDE or FB is a CFC: Were there any		
	intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the		
	tax year, in which the FDE or FB acted as a manufacturing, selling, or purchasing branch?		
10a	Answer the remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE		
	is a U.S. corporation: If the FB or the interest in the FDE is a separate unit under Regulations section		
	1.1503(d)-1(b)(4), and is not part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii),		
	does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		
	If "Yes," enter the amount of the dual consolidated loss ▶ <u>\$ (</u>		
11a	If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under		
	Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss as		
	defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		
	Enter the amount of the dual consolidated loss for the combined separate unit \$ ()		
С	Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determined		
	under Regulations section 1.1503(d)-5(c)(4)(ii)(A) ▶ \$		
12a	Was any portion of the dual consolidated loss in line 10b or 11b taken into account in computing U.S.		
	taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13		
D	Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? If		
_	"Yes," see the instructions and go to line 12c. If "No," go to line 12d		
C	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section		
4	1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
u	taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e		
•			
е	Enter the separate unit's contribution to the cumulative consolidated taxable income ("cumulative register") as of the haringing of the tax year.		
120	("cumulative register") as of the beginning of the tax year ► \$ See instructions. During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring		
ısa	recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or as		
	part of a combined separate unit, in any prior tax years?		
h	If "Yes," enter the total amount of recapture		
J	α 100, onto the total amount of recaptains α 100, on α		

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