

Tax on Base Erosion Payments of Taxpayers With Substantial Gross Receipts

For tax year beginning _____, 20_____, and ending _____, 20_____

▶ Go to www.irs.gov/Form8991 for instructions and the latest information.

▶ See instructions.

Employer identification number

Part I Applicable Taxpayer

Check box if this form is being filed by a taxpayer with which another taxpayer has been aggregated under section 59A(e)(3).
If the above box is checked, attach a statement listing the names and EINs of all separate taxpayers taken into account in the determination of "1 person" under section 59A(e)(3).

	(a) First Preceding Tax Year	(b) Second Preceding Tax Year	(c) Third Preceding Tax Year
1a Gross receipts of the applicable taxpayer. See instructions			
b Gross receipts from partnerships			
c Gross receipts of all other persons treated as 1 person as the "applicable taxpayer" pursuant to section 59A(e)(3)			
d Gross receipts. Combine lines 1a through 1c			
e Gross receipts of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 1d			1e
f 3-year average annual gross receipts (Divide line 1e by 3.0)			1f
g Is line 1f \$500 million or more? <input type="checkbox"/> Yes. Continue to line 2. <input type="checkbox"/> No. STOP here and attach this form to your tax return.			
2a Aggregate base erosion tax benefit (from Schedule A, line 14)			2a
b Aggregate amount of deductions allowable under Chapter 1 of the Internal Revenue Code			2b
c Other allowable deductions not included in line 2b above	2c		
d Base erosion tax benefits resulting from reductions in insurance premiums reported on Schedule A, line 8, column a-2	2d		
e Base erosion tax benefits resulting from reductions in gross receipts reported on Schedule A, line 10, column a-2	2e		
f Add lines 2c through 2e			2f
g Total deductions for amounts paid or accrued for services to which the exception under section 59A(d)(5) applies (from Schedule A, line 5b)	2g		
h Qualified derivative payments excepted by section 59A(h)	2h		
i Total deductions allowed under sections 172, 245A, and 250 for the tax year	2i		
j Combine lines 2g through 2i			2j
k Total Deductions. Subtract line 2j from the sum of line 2b and line 2f			2k
l Base Erosion Percentage for purposes of section 59A(c)(4)(A). Divide line 2a by line 2k			2l %
m Is the taxpayer's base erosion percentage on line 2l 3% or higher (2% or higher for a bank or securities dealer)? <input type="checkbox"/> Yes. Continue to Part II. <input type="checkbox"/> No. STOP after completing Part I and Schedule A and attach this form to your tax return.			