

**Schedule A Base Erosion Payments and Base Erosion Tax Benefits** (see instructions) (continued from page 3)

|  | Check all applicable boxes in columns (c), (d), and (e) below                   |   |   |   |                                      |   |   |
|--|---|---|---|---|--------------------------------------|---|---|
|  | (a-1)<br>Aggregate Base Erosion Payment for Purposes of Base Erosion Percentage | (a-2)<br>Aggregate Base Erosion Tax Benefit for Purposes of Base Erosion Percentage | (b-1)<br>Base Erosion Payment for Purposes of Modified Taxable Income | (b-2)<br>Base Erosion Tax Benefit for Purposes of Modified Taxable Income | (c)<br>Any 25% Owner of the Taxpayer | (d)<br>Person Related Under Sections 267(b) or 707(b)(1) to the Taxpayer or any 25% Owner of the Taxpayer | (e)<br>Any Person Related Within the Meaning of Section 482 to the Taxpayer |
| <b>Type of Base Erosion Payments</b>   |   |   |   |   |                                      |   |   |
| <b>9a</b> Nonqualified derivative payments . . . . .   |   |   |   |   |                                      |   |   |
| <b>b</b> Qualified derivative payments excepted by section 59A(h) . . . . . \$   |   |   |   |   |                                      |   |   |
| <b>10</b> Payments reducing gross receipts made to surrogate foreign corporation . . . . .   |   |   |   |   |                                      |   |   |
| <b>11</b> Other payments - specify . . . . .   |   |   |   |   |                                      |   |   |
| <b>12</b> Combine lines 3 through 11 . . . . .   |   |   |   |   |                                      |   |   |
| <b>13</b> Base erosion tax benefits related to payments reported on lines 3 through 11, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at 30% statutory withholding tax rate . . . . .  |   |   |   |   |                                      |   |   |
| <b>14</b> Total base erosion tax benefits for purposes of computing base erosion percentage. Subtract line 13, column (a-2) from line 12, column (a-2). Enter on Part I, line 2a . . . . .   |   |   |   |   |                                      |   |   |
| <b>15</b> Portion of base erosion tax benefits reported on lines 3 through 11, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at reduced withholding rate pursuant to income tax treaty. Multiply ratio of percentage withheld divided by 30% times tax benefit. See instructions . . . . . |   |   |   |   |                                      |   |   |
| <b>16</b> Total base erosion tax benefits for purposes of determining MTI. Subtract the sum of line 13, column (b-2); and line 15, column (b-2) from line 12, column (b-2). Enter this amount on Part II, line 3b . . . . .  |   |   |   |   |                                      |   |   |