

SECTION 2 - Applicable Percentage for Disallowance of Foreign Tax Credit Not From Pass-Throughs

2018 Tax Year Applicable Percentage		2018 Tax Year
29	Portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 12	29
30	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	30
31	Divide line 29 by line 30	31
32	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 31 by 0.771	32
33	Portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 9	33
34	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	34
35	Divide line 33 by line 34	35
36	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply 35 by 0.557	36
37	2018 Applicable Percentage. Add lines 32 and 36	37
2017 Tax Year Applicable Percentage		2017 Tax Year
38	Portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 23	38
39	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 20 and 23	39
40	Divide line 38 by line 39	40
41	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 40 by 0.771	41
42	Portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 20.	42
43	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 20 and 23	43
44	Divide line 42 by 43	44
45	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 44 by 0.557	45
46	2017 Applicable Percentage. Add lines 41 and 45	46