

SECTION 1—Section 965(c) Deduction by Tax Year <i>(continued)</i>		2017 Tax Year
18	Enter the amount from Part I, line 4. If -0-, skip to line 27	18
19	Aggregate Foreign Cash Position. Enter the sum from Schedule D, line 19	19
20	Enter the smaller of line 18 or 19	20
21	Enter the 2017 15.5% Rate Equivalent Percentage from Part II, Section 2. For calendar year persons, enter amount from Section 2, line 1a. For fiscal year persons, enter amount from Section 2, line 2c	21
22	Section 965(c) Deduction Related to 15.5% Rate Equivalent Percentage. Multiply line 20 by line 21	22
23	Subtract line 20 from line 18	23
24	Enter the 2017 8% Rate Equivalent Percentage from Part II, Section 2. For calendar year persons, enter amount from Section 2, line 1b. For fiscal year persons, enter amount from Section 2, line 2e	24
25	Section 965(c) Deduction Related to 8% Rate Equivalent Percentage. Multiply line 23 by line 24	25
26	2017 tax year section 965(c) deductions not from pass-throughs. Add lines 22 and 25	26
27	2017 tax year section 965(c) deductions from pass-throughs. Attach schedule	27
28	Total 2017 tax year section 965(c) deductions. Add lines 26 and 27	28

SECTION 2—Rate Equivalent Percentages

1	Calendar Year Persons	2017 Calendar Year	2018 Tax Year
a	15.5 Percent Rate Equivalent Percentage	0.557142857	0.261904762
b	8 Percent Rate Equivalent Percentage	0.771428571	0.619047619
2	2017 Fiscal Year Persons		
a	Enter the section 15 blended rate calculated in accordance with section 965(c)(2) (see instructions) 15.5 Percent Rate Equivalent Percentage	2a	
b	Subtract 15.5% from line 2a	2b	
c	Divide line 2b by line 2a 8 Percent Rate Equivalent Percentage	2c	
d	Subtract 8% from line 2a	2d	
e	Divide line 2d by line 2a	2e	

Part III	Elections	Yes	No
A	Was an election made to pay the net tax liability over 8 years as provided for in section 965(h)?		
B	Complete if a shareholder in an S corporation. Was an election made to defer payment of net tax liability as provided for in section 965(i)?		
C	Complete if a Real Estate Investment Trust. Was an election made to include income over 8 years as provided for in section 965(m)?		
D	Was an election made not to apply a net operating loss deduction as provided in section 965(n)?		
E	Was the election provided for in Regulations section 1.965-2(f)(2) made?		