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KPMG report: Initial impressions of final regulations under section 951A (GILTI) and certain guidance related to foreign tax credits, as well as new proposed regulations under sections 951A and 958 (rules for determining stock ownership)

The U.S. Treasury Department and IRS ("Treasury") on Friday, June 14, 2019, released for publication in the Federal Register final regulations (T.D. 9866) and proposed regulations (REG-101828-19) (the "final rules" and "proposed rules," respectively) relating to global intangible low-taxed income ("GILTI"), as well as certain final rules relating to the foreign tax credit ("FTC") and the section 965(n) election.

Read the [final regulations](#) [PDF 1.01 MB] (318 pages) and [proposed regulations](#) [PDF 431 KB] (74 pages) as filed with the Federal Register.

This report provides initial impressions and observations about these final and proposed rules. Read a [printable version](#) [PDF 356 KB] of this report: *Initial impressions of final regulations under section 951A (GILTI) and certain guidance related to foreign tax credits, as well as new proposed regulations under sections 951A and 958 (rules for determining stock ownership)*

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