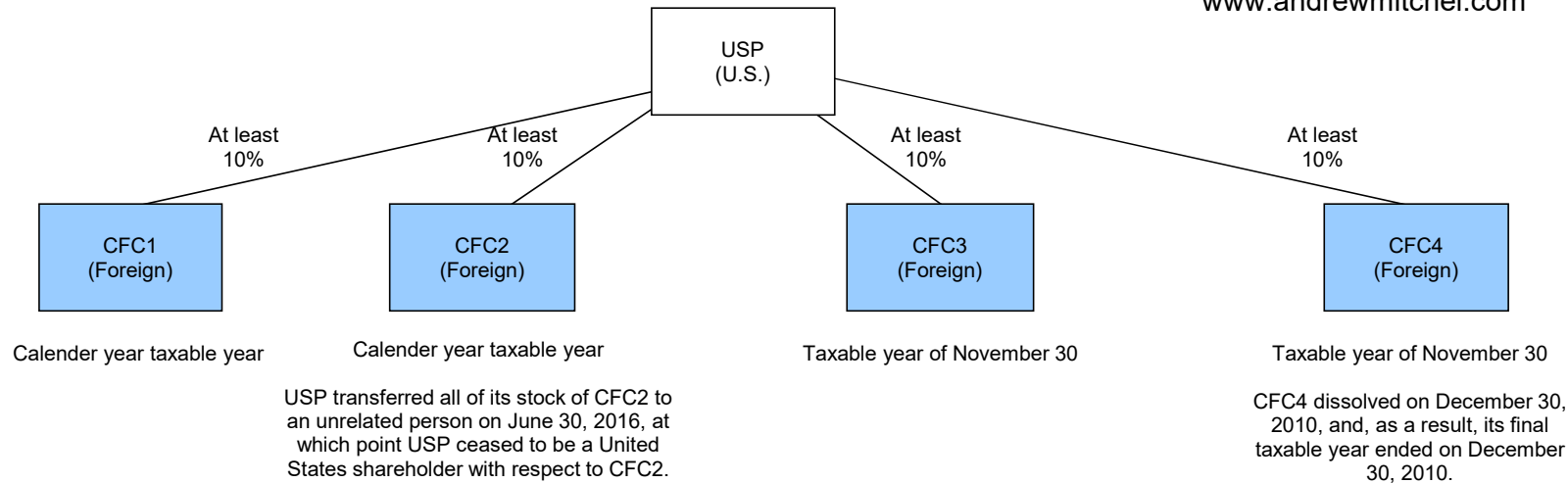


**Prop'd Reg. 1.965-1(g),
Example 7**

**Determination of Cash Measurement Dates
and Pro Rata Shares of Cash Positions**

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Except as otherwise provided, for all relevant periods, USP, a domestic corporation, has owned directly at least 10% of the stock of CFC1, CFC2, CFC3, and CFC4, each a foreign corporation. CFC1 and CFC2 have calendar year taxable years. CFC3 and CFC4 have taxable years that end on November 30. No entity has a short taxable year, except as a result of the transactions described below.

(A) USP transferred all of its stock of CFC2 to an unrelated person on June 30, 2016, at which point USP ceased to be a United States shareholder with respect to CFC2.

(B) CFC4 dissolved on December 30, 2010, and, as a result, its final taxable year ended on December 30, 2010.

Each of CFC1, CFC2, CFC3, and CFC4 is a specified foreign corporation with respect to USP, subject to the sale of CFC2 on June 30, 2016, and the dissolution of CFC4 on December 30, 2010. Under the definition of aggregate foreign cash position in Prop. Reg. 1.965-1(f)(8)(i), the definition of pro rata share of a cash position in Prop. Reg. 1.965-1(f)(30)(iii), and the definitions of the final cash measurement date, second cash measurement date, and first cash measurement date in Prop. Reg. 1.965-1(f)(24), (25), and (31), the cash measurement dates of the specified foreign corporations to be taken into account by USP in determining its aggregate foreign cash position are summarized in the following table:

Cash Measurement Dates

	<u>Final</u>	<u>Second</u>	<u>First</u>
CFC1	Dec. 31, 2017	Dec. 31, 2016	Dec. 31, 2015
CFC2	N/A	N/A	Dec. 31, 2015
CFC3	Nov. 30, 2018	Nov. 30, 2016	Nov. 30, 2015
CFC4	N/A	N/A	N/A