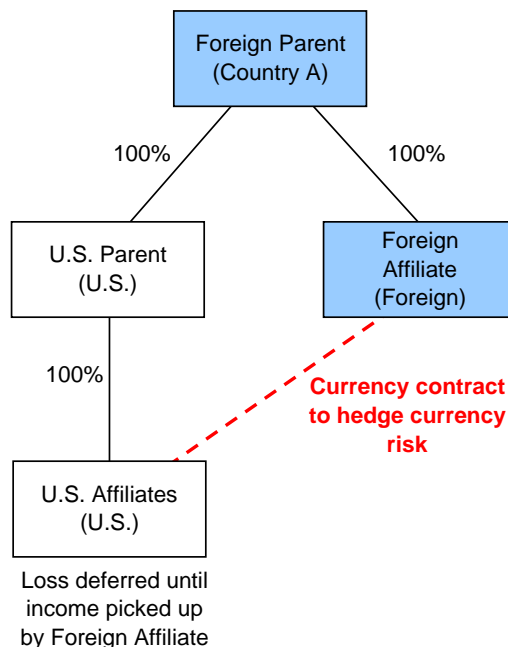


Deferral of Currency Loss on Hedge Contact Under 267(f)(2)



A loss realized by a member of the US Parent Group from a currency contract with a Foreign Affiliate that is treated as loss from the sale or exchange of property will be deferred under § 267(f)(2) only until the Foreign Affiliate has taken its corresponding item of income into account under the Foreign Affiliate's method of accounting, provided that no currency involved in such contract is hyperinflationary within the meaning of Treas. Reg. § 1.988-1(f).