



Ivins Attorney Comments on Guidance under Section 909

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Tax Notes Today

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Ivins, Phillips & Barker attorney John D. Bates was quoted several times in *Tax Notes Today* regarding upcoming guidance under the section 909 foreign tax credit splitter rules. Guidance under section 909 was listed on the IRS and Treasury's priority guidance plan for 2010-2011, and government officials have indicated that it is coming in the next few months. The first round of guidance on section 909, Notice 2010-92, addressed the section's application to foreign taxes paid or accrued by a section 902 corporation in taxable years beginning on or before December 31, 2010.