



Les Schneider and Pat Smith submit comments on new sections 451(b) and 451(c)

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PRACTICE AREAS

Tax

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Ivins attorneys Les Schneider and Pat Smith have submitted comments to the IRS and Treasury regarding new Code sections 451(b) and 451(c). The comments set forth detailed legal arguments as to why, if taxpayers are required to recognize revenue for tax purposes under either section 451(b) or section 451(c), such taxpayers should be allowed to claim an offset against this revenue for the costs associated with earning the revenue, including not only costs already incurred at the time the revenue is recognized but also all costs expected to be incurred in the future that are related to the revenue. These new comments are a follow-up to comments submitted by Les and Pat last month on a broader range of issues under sections 451(b) and 451(c).