



Nature Abhors a Splitter: The FTC Splitter and Indirect FTC Rules

PRACTICE AREAS

International Tax

Tax

Tax Controversies

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Tax Notes

February 14, 2011

This report discusses the interaction of new section 909 with sections 902 and 960. It provides discrete recommendations for the coordination of these rules and responds to recent comments by policymakers suggesting that a related income first earnings and profits distribution ordering rule might not be available prospectively under section 909.