

112TH CONGRESS  
1ST SESSION

# H. R. 2735

To amend the Internal Revenue Code of 1986 to make permanent the look-through treatment of payments between related controlled foreign corporations.

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## IN THE HOUSE OF REPRESENTATIVES

AUGUST 1, 2011

Mr. BOUSTANY (for himself and Mr. KIND) introduced the following bill;  
which was referred to the Committee on Ways and Means

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## A BILL

To amend the Internal Revenue Code of 1986 to make permanent the look-through treatment of payments between related controlled foreign corporations.

1 *Be it enacted by the Senate and House of Representa-*  
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. LOOK-THROUGH TREATMENT OF PAYMENTS**

4 **BETWEEN RELATED CONTROLLED FOREIGN**

5 **CORPORATIONS MADE PERMANENT.**

6 (a) IN GENERAL.—Subparagraph (C) of section  
7 954(c)(6) of the Internal Revenue Code of 1986 is amend-  
8 ed by striking “and before January 1, 2012,”.

1       (b) EFFECTIVE DATE.—The amendment made by  
2 this section shall apply to taxable years of foreign corpora-  
3 tions beginning after December 31, 2011, and to taxable  
4 years of United States shareholders with or within which  
5 such taxable years of foreign corporations end.

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