

MEMO# 27661

October 30, 2013

IRS Releases Draft FFI Agreement

[27661]

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TO: TAX MEMBERS No. 31-13
INTERNATIONAL MEMBERS No. 52-13
INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 14-13
TRANSFER AGENT ADVISORY COMMITTEE No. 76-13
BROKER/DEALER ADVISORY COMMITTEE No. 48-13
ICI GLOBAL TAX COMMITTEE No. 21-13
TAAC FATCA TASK FORCE No. 6-13 RE: IRS RELEASES DRAFT FFI AGREEMENT

The Internal Revenue Service released [Notice 2013-69 \[1\]](#) that contains a draft FFI agreement for participating FFIs directly engaging in agreements with the IRS and those reporting through a Model 2 intergovernmental agreement. The Notice also previews proposed guidance. The IRS intends to finalize the draft FFI agreement by December 31, 2013.

Ryan Lovin
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endnotes

[\[1\]](#) Notice 20013-69 is available at: <http://www.irs.gov/pub/irs-drop/n-13-69.pdf>