

MEMO# 32731

September 1, 2020

For Discussion During September 2 Tax Committee Call: Draft Outline of Comments to French Tax Administration

[32731]

September 1, 2020 TO: Tax Committee RE: For Discussion During September 2 Tax Committee Call: Draft Outline of Comments to French Tax Administration

During our Tax Committee call^[1] on Wednesday, September 2, at 11:00 (Eastern), the Committee will discuss the proposed French Tax Administration guidance for providing at-source withholding tax relief.^[2] This proposed guidance is the product of several years of effort by industry members to recover French tax withheld in violation of Article 63 of the Treaty on the Functioning of the European Union.

The draft outline of the ICI comment letter that we will discuss on the call sets forth the industry's views regarding how RICs will establish that they satisfy each of the seven requirements set forth in the proposed guidance. Your assistance is needed to (1) develop further our views on why each requirement is met and (2) determine what we should assert constitutes the information and documentation that RICs should provide when seeking a determination of eligibility for at-source relief.

As comments on the draft guidance are due by September 15, your comments during or shortly after our Committee call on September 2nd will be most welcome. Please send your comments on the outline to Katie Sunderland (at katie.sunderland@ici.org) and Keith Lawson (at lawson@ici.org).

Keith Lawson
Deputy General Counsel - Tax Law

[Attachment](#)

endnotes

^[1] See Institute [Memorandum No. 32709](#), dated August 26, 2020.

[2] See Institute [Memorandum No. 32702](#), dated August 24, 2020.

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