

MEMO# 27443

August 6, 2013

Call to Discuss Proposed Regs on Controlled Groups -- Thursday, Aug. 15 at 2:00 p.m. ET

[27443]

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TO: TAX COMMITTEE No. 20-13 RE: CALL TO DISCUSS PROPOSED REGS ON CONTROLLED GROUPS -- THURSDAY, AUG. 15 AT 2:00 P.M. ET

The Internal Revenue Service has issued proposed regulations relating to the application of the “controlled group” rules in section 851(c). [\[1\]](#) The proposed regulations amend the examples contained in Treas. Reg. § 1.851-5 to clarify that two corporations constitute a controlled group if the ownership requirements of section 851(c)(3) are met. In other words, a regulated investment company (RIC) and its controlled subsidiary constitute a controlled group even though the subsidiary does not control at least one other corporation.

We have scheduled a conference call for Thursday, August 15, at 2:00 p.m. ET to discuss the proposed regulations. The dial-in number for the call is 888-793-1858 and the passcode is 48615. If you wish to participate in the call, please notify Brenda Turner at 202-326-5820 or bturner@ici.org.

Karen Lau Gibian
Associate Counsel

endnotes

[\[1\]](#) See Institute Memorandum [27432](#) dated August 1, 2013.