

113TH CONGRESS
2D SESSION

H. R. 4464

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

IN THE HOUSE OF REPRESENTATIVES

APRIL 10, 2014

Mr. BOUSTANY (for himself, Mr. KIND, Mr. REED, Mr. SCHOCK, Ms. JENKINS, Mr. TIBERI, Mr. PASCRELL, Mr. LARSON of Connecticut, Mr. YOUNG of Indiana, Mr. MATHESON, and Mr. CROWLEY) introduced the following bill; which was referred to the Committee on Ways and Means

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.—Paragraph (6) of section 954(c)
7 of the Internal Revenue Code of 1986 is amended by strik-
8 ing subparagraph (C).

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, 2013, and to taxable
4 years of United States shareholders with or within which
5 such taxable years of foreign corporations end.

