

Tax Year

Work Request Notification

To:	Symbols:	Initials:	Date:
1. Scanned by:	SE:W:CAR:MP:T: :		
2. Section Chief:	SE:W:CAR:MP:T: :		
3. Reviewer:	SE:W:CAR:MP:T: : R		
4. Review Chief:	SE:W:CAR:MP:T: : R		
5. Branch Chief:	SE:W:CAR:MP:T:		
6. Senior Technical Advisor: Bob Erickson	SE:W:CAR:MP:T		
7. *TPCC Circulations Email sent to Distribution List by:			
8. Initiator (Tax Law Specialist):	SE:W:CAR:MP:T: :	Completed:	

Attached is a marked up draft that can be used to develop any necessary Work Requests for the processing year. The major changes are as follows:

This Notification is for changes due to:

Legislation or other Chief Counsel guidance:

A Program change initiated by:

We do not anticipate the need for any further changes that would require a Work Request Notification.

We may need to make further changes that would require a subsequent Work Request Notification.

If you have any questions, please contact the TLS shown below, or the reviewer on line 3 (above).

From:	Initials:	Room:	Email:
	Date:	Phone Number:	Fax Number:

**SCHEDULE M
(Form 5471)**

(Rev. December 2007)
Department of the Treasury
Internal Revenue Service

**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0704

▶ Attach to Form 5471. See Instructions for Form 5471.

Name of person filing Form 5471	Identifying number
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Name of foreign corporation

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions. Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.)					
Insert A 6 4 Compensation received for technical, managerial, engineering, construction, or like services					
7 5 Commissions received					
8 6 Rents, royalties, and license fees received					
9 7 Dividends received (exclude deemed distributions under subpart F and distributions of previously taxed income)					
10 8 Interest received					
11 9 Premiums received for insurance or reinsurance					
12 10 Add lines 1 through 9. 11					
13 11 Purchases of stock in trade (inventory)					
14 12 Purchases of tangible property other than stock in trade					
15 13 Purchases of property rights (patents, trademarks, etc.)					
Insert B 18 14 Compensation paid for technical, managerial, engineering, construction, or like services					
19 15 Commissions paid					
20 16 Rents, royalties, and license fees paid.					
21 17 Dividends paid					
22 18 Interest paid					
23 19 Premiums paid for insurance or reinsurance					
24 20 Add lines 17 through 19. 13 23					
25 21 Amounts borrowed (enter the maximum loan balance during the year) — see instructions					
26 22 Amounts loaned (enter the maximum loan balance during the year) — see instructions					

Note - if necessary carry new lines 25-26 to new page.



Insert A

- 4 Buy-in payments received
- 5 Cost sharing payments received

Insert B

- 16 Buy-in payments paid
- 17 Cost sharing payments paid