

**2007 Schedule O (Form 8865)**  
**Transfer of Property to a Foreign Partnership**  
**(under section 6038B)**

**Purpose:** This is the first circulated draft of the 2007 Schedule O (Form 8865) for your review and comments. There are no major changes.

**TPCC meeting:** No meeting is planned, but you may request one by contacting Kelli Patilla.

**Prior Revisions** The 2006 Schedule O (Form 8865) may be accessed at:  
<http://www.irs.gov/pub/irs-pdf/f8865so.pdf>

**Other products** Circulations of draft tax forms and instructions are posted at  
[http://taxforms.web.irs.gov/draft\\_products.html](http://taxforms.web.irs.gov/draft_products.html). Draft publications are not available.

**Comments:** Please email, fax, call, or mail any comments by **June 22, 2007**, to me at the address below and email the form's reviewer, Sharon Dewsbury, at  
[Sharon.A.Dewsbury@irs.gov](mailto:Sharon.A.Dewsbury@irs.gov).

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**SCHEDULE O  
(Form 8865)**

Department of the Treasury  
Internal Revenue Service

**Transfer of Property to a Foreign Partnership  
(under section 6038B)**

▶ Attach to Form 8865. See Instructions for Form 8865.

OMB No. 1545-1668

2006

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Name of transferor	Filer's identifying number
Name of foreign partnership	

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interest in partnership after transfer
Cash							
Marketable securities							
Inventory							
Tangible property used in trade or business							
Intangible property							
Other property							

**Supplemental Information Required To Be Reported** (see instructions):


**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  No