## Caution: DRAFT FORM

This is an advance proof copy of an IRS tax form. It is subject to change and OMB approval before it is officially released. You can check the scheduled release date on our web site (www.irs.gov).

If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

## Part I List of Foreign Partner Interests in Partnerships

(a) Name of partnership
(b) Address
(c) EIN
(d) For each partnership, is the foreign corporation's distributive share ECI, or treated as ECI, in whole or in part, with a U.S. trade or business determined under section 875 (see instructions)?

|  |  |  |
| :--- | :--- | :--- |
| A |  |  |
| B |  |  |
| undersection875(see instructions)? |  |  |

Note: If corporation has more than 4 partnership interests, continue on separate page. See instructions.
Part II Foreign Partner Income and Expenses: Reconciliation to Schedule K-1 (Form 1065)

1 Net income (loss) reported on lines 1 through 3, Schedule K-1
2 Gross income included on lines 1 through 3, Schedule K-1
3 Gross effectively connected income (ECI) on lines 1 through 3, Schedule K-1
4 Other non-interest expenses on lines 1 through 3, Schedule K-1
5 Non-interest expenses on lines 1 through 3, Schedule K-1, allocated to gross ECI
6 Other gross income reported on Schedule K-1
7 Other gross ECI reported on Schedule K-1
8 Other non-interest expenses reported on Schedule K-1
9 Other non-interest expenses reported on Schedule K-1 allocated to ECl
10 Total gross income. Add lines 2 and 6 11 Total gross effectively connected income. Add lines 3 and 7 12 Interest expense on lines 1 through 3 , Schedule K-1
13 Other interest expense reported on
Schedule K-1, lines 13 and 18
14a Total interest expense. Add lines 12 and 13 b Interest expense directly allocable
under Temporary Regulations section Interest expense directly allocable
under Temporary Regulations section 1.882-5T(a)(1)(ii)(B). (Note: Include the line 14b total on Schedule I, line 22.) c Subtract line 14b from line 14a. (Note: Enter the line 14c total on Schedule I, line 9, column (b).)

Schedules K-1

Schedules K-1

15 Section 705 outside basis
16a Partner's liabilities included in outside basis under section 752 that give rise to directly allocable interest expense under Temporary Regulations section 1.882-5T(a)(1)(ii)(B)
b All other liabilities included in partner's outside basis under section 752
c Add lines 16a and 16b
d Subtract line 16c from line 15 .
17 Partner's liabilities under Regulations section 1.884-1(d)(3)(vi). (Note: Enter the line 17 total on Schedule I, line 8, column (b).)
18 Partner's outside basis under Regulations section 1.884-1(d)(3)(vi). Add lines 16d and 17
19 Partner's outside basis allocable to ECI under Regulations section 1.884-1(d)(3)(i). (Note: Enter the line 19 total on Schedule I, line 5, column (b).)
20 Enter "income" or "asset" to indicate the allocation method used on line 19 (see instructions)

