

Office of Chief Counsel  
Internal Revenue Service  
**memorandum**

date: November 21, 2011

to: IRS Reports Clearance Officer

from: Joseph L. Tobin CC:INTL:06

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subject: Final Regulations on Section 482: Methods to Determine Taxable Income in Connection With a Cost Sharing Arrangement

The collections of information contained in these final regulations were submitted to the Office of Management and Budget in a notice of proposed rulemaking and temporary regulations (REG-144615-02) and approved on December 6, 2009, under control number 1545-1364. Written comments responding to the notice were received and a public hearing was held on April 21, 2009. These final regulations adopt the temporary regulations with minor revisions based on the comments received. Minor changes were made to the final regulations to clarify and add definitions for clarity. No changes were made to the affected forms 1118 and 5471 as a result. There is no change in the paperwork burden.

Attachment (1)

[Draft of final regulation]