

Future Developments

For the latest information about developments related to Form 8819 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/Form8819.

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

Form 8819 is filed by or on behalf of a noncontrolled section 902 corporation (defined in section 904(d)(2)(E)) operating in a hyperinflationary environment that elects the U.S. dollar as its (or its qualified business unit (QBU) branch's) functional currency.

Who Must File

- If an election is made by a noncontrolled section 902 corporation, Form 8819 must be filed by an authorized officer or director of the corporation.
- If the election is made on behalf of a noncontrolled section 902 corporation or branch of a noncontrolled foreign corporation, Form 8819 must be filed by each of the majority domestic corporate shareholders (as defined in Regulations section 1.985-2(c)(3)).

Signature. If there is not enough space for all required filers to sign Form 8819, attach a sheet showing each additional signature, that person's title, if any, and the date signed. The attachment must be signed under penalties of perjury.

When and Where To File

File Form 8819 within 180 days after the end of the tax year for which the dollar election is made. Send it to the following address.

Internal Revenue Service
P.O. Box 409101
Ogden, UT 84409

Specific Instructions

Address. Include the suite, room, or other unit number after the street address. If the post office does not deliver mail to the street address and the filer has a P.O. box, show the box number instead of the street address.

Line 3. If the box on line 1a is checked, enter the name, address, identifying number, and percentage of stock owned (as defined in section 902(b)) in each class of stock for each domestic corporate shareholder.

If the box on line 1b is checked, enter the name, address, identifying number, and the percentage of stock owned (within the meaning of section 958(a)) in each class of stock for each domestic corporate shareholder (as described in section 902(a)) making the election.

Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for business taxpayers filing this form is approved under OMB control number 1545-0123.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form simpler, we would be happy to hear from you. You can send us comments from www.irs.gov/FormComment. Or you can write to the Internal Revenue Service, Tax Forms and Publications, 1111 Constitution Ave. NW, IR-6526, Washington, DC 20224. **Don't** send the form to this office. Instead, see *When and Where To File*, earlier.