

110TH CONGRESS  
1ST SESSION

# S. 1273

To amend the Internal Revenue Code of 1986 to allow permanent look-through treatment of payments between related foreign corporations.

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IN THE SENATE OF THE UNITED STATES

MAY 2, 2007

Mr. KYL introduced the following bill; which was read twice and referred to the Committee on Finance

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## A BILL

To amend the Internal Revenue Code of 1986 to allow permanent look-through treatment of payments between related foreign corporations.

1       *Be it enacted by the Senate and House of Representa-  
2       tives of the United States of America in Congress assembled,*

3       **SECTION 1. PERMANENT LOOK-THROUGH TREATMENT OF  
4                    PAYMENTS BETWEEN RELATED CONTROLLED  
5                    FOREIGN CORPORATIONS UNDER THE FOR-  
6                    EIGN PERSONAL HOLDING COMPANY RULES.**

7       Section 954(c)(6)(B) of the Internal Revenue Code  
8       of 1986 is amended by striking “and before January 1,  
9       2009.”.

