



# TaxNewsFlash

## United States

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### **Proposed regulations under GILTI provisions released in Federal Register**

The U.S. Treasury Department and IRS this afternoon released for publication in the Federal Register proposed regulations (REG-104390-18) relating to the “global intangible low-taxed income” (GILTI) provisions under the new U.S. tax law.

Read the [proposed regulations](#) [PDF 389 KB] (40 pages) as officially released for publication in the Federal Register.

Treasury and the IRS on September 13, 2018, released a version of these proposed regulations, and with that release, noted that the proposed regulations had been submitted to the Federal Register for publication; that such publication was pending; and that the version of the proposed regulations released on September 13 “... may vary slightly from the published document if minor editorial changes are made during the [Federal Register] review process. The document published in the Federal Register will be the official document.”

Treasury and the IRS have requested comments on these proposed regulations. Comments and requests for a public hearing must be received by a date that is 60 days after the date when these regulations will appear in the Federal Register, which is scheduled for October 10, 2018.

#### **KPMG observation**

Now that the proposed regulations have been released for publication in the Federal Register, a question is whether any changes were made.

Read a [computer-generated document](#) [PDF 3.8 MB] (an unofficial document produced by KPMG) that compares the version of the proposed regulations released on September 13, 2018, with the version of the proposed regulations released today for publication in the Federal Register. This document is intended to show what

changes, if any, have been made to the proposed regulations prior to publication in the Federal Register. It has not been reviewed for accuracy.

**Legend:** Omitted text is shown as stricken, new text is indicated by the blue "symbol," and replaced text is highlighted in orange.

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