

114TH CONGRESS  
1ST SESSION

# H. R. 1430

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

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## IN THE HOUSE OF REPRESENTATIVES

MARCH 18, 2015

Mr. BOUSTANY (for himself, Mr. KIND, Mr. PASCRELL, Mr. NEAL, Mr. REED, Mr. TIBERI, Mr. SCHOCK, and Mr. LARSON of Connecticut) introduced the following bill; which was referred to the Committee on Ways and Means

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## A BILL

To amend the Internal Revenue Code of 1986 to make permanent the look-through treatment of payments between related controlled 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. SHORT TITLE.**

4 This Act may be cited as the “Permanent CFC Look-  
5 Through Act of 2015”.

1 **SEC. 2. LOOK-THROUGH TREATMENT OF PAYMENTS BE-**  
2 **TWEEN RELATED CONTROLLED FOREIGN**  
3 **CORPORATIONS MADE PERMANENT.**

4 (a) **IN GENERAL.**—Section 954(c)(6) of the Internal  
5 Revenue Code of 1986 is amended by striking subpara-  
6 graph (C).

7 (b) **EFFECTIVE DATE.**—The amendment made by  
8 this section shall apply to taxable years of foreign corpora-  
9 tions beginning after December 31, 2014, and to taxable  
10 years of United States shareholders with or within which  
11 such taxable years of foreign corporations end.

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