

CALIFORNIA FRANCHISE TAX BOARD

Internal Procedures Manual
Water's Edge Manual

Rev.: September 2001

**EXHIBIT 9.3A
IRC SUBPART F SUMMARY**

<u>SUBPART F OF THE IRC</u>	<u>IRC 952 - SUBPART F</u>	<u>FOREIGN BASE CO INC</u>
		F Personal Holding Company Income
	Insurance Income	
Subpart F Income 952		FBC Sales
	Foreign Base Company Inc	
Subpart F Property 956		FBC Services
	International Boycott Inc	
Previously Excluded 951		FBC Shipping
	Illegal Bribes & Kickbacks	
Previously Excluded 955		FBCO
	901(j) Foreign Countries	
Excess Passive Asset 956A		
		De Minimis Rules
		High Foreign Tax Rule
		Full Inclusion Rule

The information provided in the Franchise Tax Board's internal procedure manuals does not reflect changes in law, regulations, notices, decisions, or administrative procedures that may have been adopted since the manual was last updated