



PO BOX 1720
SACRAMENTO CA 95741-1720
Telephone (916) 845-3306
Fax (916) 845-3648

JOHN CHIANG
Chair
BETTY YEE
Member
ANA J. MATOSANTOS
Member

Interested Parties Meeting

To attend this meeting, please RSVP by April 16, 2010, by contacting Colleen Berwick at (916) 845-3306 or Email: Colleen.Berwick@ftb.ca.gov. Space is limited.

To participate in this meeting by telephone, use this number to dial in: (877) 923-3149. The participant pass code is 2233420.

When

April 21, 2010
1:00 p.m.

Where

Franchise Tax Board
Golden State Room A
9646 Butterfield Way
Sacramento, CA 95827
(North Lobby entrance)

Topic ([See Discussion Topics](#))

Discuss updating existing California Code of Regulations, title 18, section 25106.5-1 (Intercompany Transactions) to:

- Provide further guidance regarding the proper apportionment treatment of intercompany transactions that are reported utilizing the simplifying rules of section 25106.5-1, subsection (e).
- Amend Regulation section 25106.5-1, subsection (f)(1)(B), relating to Deferred Intercompany Stock Accounts, to provide further guidance addressing mergers, subsequent capital contributions and the effect of tiered distributions.
- Amend Regulation section 25106.5-1 to bring it into conformity with the most recent version of Treasury Regulation section 1.1502-13.

Purpose

To elicit public input on possible amendments to Regulation section 25106.5-1 that will address the proper application of the subsection (e) election to report intercompany transaction income or loss on a separate entity basis. Public input is also needed relating to the possibility of amending the Deferred Intercompany Stock Accounts (DISA) provisions to provide additional guidance to taxpayers. Moreover, the public may have suggestions and comments regarding recently enacted provisions of Treasury Regulation section 1.1502.13.

Contacts

Laurie McElhatton (Regulation section 25106.5-1, subdivision (e) election):

- Email: Laurie.McElhatton@ftb.ca.gov
- Telephone: (916) 845-6916
- Address: Legal Division (MS-A260), P.O. Box 1720, Rancho Cordova, CA 95741-1720.

Craig Swieso (Regulation section 25106.5-1, subdivision (f)(1)(B) [DISA] and conformity issues):

- Email: Craig.Swieso@ftb.ca.gov
- Telephone: (916) 845-5244
- Address: Legal Division (MS-A260), P.O. Box 1720, Rancho Cordova, CA 95741-1720

[Visitor Parking Map](#)

* This facility is architecturally accessible to persons with physical disabilities.