

**Legal Division Guidance 2010-06-01**

(Contribution Deduction Question – RTC Section 24357.8(b)(7))

Q: When can a deduction for a "qualified research contribution" be taken under RTC section 24357.8(b)(7)?

A: RTC section 24357.8(b)(7) requires that the original contribution be made between 1983 and 1993, not that the entire deduction be taken during that 10-year period. While a deduction would be allowable for the taxable year in which the contribution was made, a taxpayer with excess contributions is allowed to carry forward and deduct these excess contributions in taxable years after the taxable year in which the contribution was originally made.