Form **8895**

(August 2005)

Department of the Treasury
Internal Revenue Service

One-Time Dividends Received Deduction for Certain Cash Dividends from Controlled Foreign Corporations

► **Attach to the corporation's tax return.**

OMB No. 1545-1948

Name of corporation	Employer identification number

Part I Qualifying Information

A Enter the date(s) the corporation's domestic reinvestment plan(s) (DRP) was approved by the corporation's president, CEO, or comparable official ►_____ , 20 ____ .

B Enter the date(s) the DRP was approved by the corporation's board of directors, management committee, executive committee, or similar body ►_____ , 20 ____ .

C The DRP states that the corporation anticipates completing all reinvestments in the tax year ending _____ , 20 ____ . See Notice 2005-10 for required attachment.

D Does the corporation have an applicable financial statement (as defined in section 965(c)(1)) that shows a specific amount of earnings permanently reinvested outside the United States? . . . . ☐ **Yes** ☐ **No**

   If "Yes," enter that amount on line 2 below. However, if the corporation is a member of a controlled group of corporations, see instructions.

   If "No," complete item E below.

E If item D is "No," does the corporation have an applicable financial statement that shows a specific amount of tax liability attributable to earnings permanently reinvested outside the United States? . . . . ☐ **Yes** ☐ **No**

   If "Yes," divide the tax liability by 0.35 and enter the result on line 2 below. However, if the corporation is a member of a controlled group of corporations, see instructions.

   If "No," enter -0- on line 2 below.

F Is the corporation required to adjust the amount of its base period inclusions, APB 23 limitation, or related party indebtedness pursuant to Notice 2005-38? . . . . ☐ **Yes** ☐ **No**

Part II Dividends Received Deduction

1	Enter the "cash dividends" that the corporation received from all controlled foreign corporations (CFCs) during the tax year. See instructions	**1**		
2	Earnings permanently reinvested outside the United States (see items D and E above). . . .	**2**		
3	**Section 965(b)(1) limit.** Enter the greater of line 2 or $500,000,000. However, if the corporation is a member of a controlled group of corporations, see instructions	**3**		
4	Section 965(b)(2) base period amount. Enter amount from Part VI, line 51	**4**		
5	**Section 965(b)(2) limit.** Subtract line 4 from line 1. If zero or less, stop here (see instructions).	**5**		
6	**Section 965(b)(4) limit.** Amounts to be reinvested in the United States under a DRP	**6**		
7	Enter the smallest of lines 3, 5, and 6	**7**		
8	Enter the amount of CFC indebtedness to any related person as of the close of the tax year (see instructions) **8**			
9	Enter the amount of CFC indebtedness to any related person as of the close of October 3, 2004 (see instructions) **9**			
10	**Section 965(b)(3) limit.** Subtract line 9 from line 8. If zero or less, enter -0-	**10**		
11	**Qualifying dividends.** Subtract line 10 from line 7. If zero or less, stop here (see instructions). If more than zero, enter the result here and on Form 1120, Schedule C, line 12, column (a)	**11**		
12	Enter all section 965(a)(2) amounts included on line 11 (see instructions) **12**			
13	**Deductible portion of qualifying dividends.** Multiply line 11 by 85%. Enter here and on Form 1120, Schedule C, line 12, column (c) _____	**13**		
14	Expenses disallowed under section 965(d)(2) with respect to line 13 amount **14**			
15	**Nondeductible CFC dividends.** Subtract line 13 from line 11. See instructions	**15**		

Part III Regular Tax Liability for Computing Credit Limitations and Alternative Minimum Tax

16	Enter the corporation's taxable income (Form 1120, line 30)	**16**	
17	**Taxable income excluding nondeductible CFC dividends.** Subtract line 15 from line 16 . . .	**17**	
18	Enter the corporation's regular tax liability (Form 1120, Schedule J, line 3)	**18**	
19	**Tax on nondeductible CFC dividends.** Enter the smaller of line 18 or 35% of line 15	**19**	
20	**Tax on line 17 amount.** Subtract line 19 from line 18	**20**	
21	**Foreign tax credit that reduces tax on line 19** (see instructions)	**21**	
22	Subtract line 21 from line 19	**22**	
23	**Foreign tax credit that reduces tax on line 20.** Subtract line 21 from line 39	**23**	
24	Subtract line 23 from line 20	**24**	
25	Alternative minimum tax (see instructions)	**25**	

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| **Part IV** | Foreign Tax Credit—Additional Limitation for Separate Categories With Nondeductible CFC Dividends (see instructions) |

26	Enter the name of the separate category . . . . ▶ _____			
27	Enter the amount of nondeductible CFC dividends in the separate category	27		
28	Subtract line 27 from the amount on Form 1118, Schedule B, Part II, line 6	28		
29	Subtract line 27 from the amount on Form 1118, Schedule B, Part II, line 7c	29		
30	Divide line 28 by line 29	30		
31	Enter 35% of line 27	31		
32	Subtract line 31 from the amount on Form 1118, Schedule B, Part II, line 9	32		
33	Multiply line 30 by line 32	33		
34	Enter foreign taxes paid or accrued with respect to line 27 amount	34		
35	Add lines 33 and 34	35		
36	Enter the credit computed for the separate category on Form 1118, Schedule B, Part III . . .	36		
37	Enter the smaller of line 35 or line 36	37		
38	Enter the smaller of line 31 or line 34	38		
39	Enter the corporation's revised foreign tax credit for all separate categories (see instructions) .	39		

| **Part V** | Schedule of Dividends (see instructions) |

(a) Name of CFC	(b) Date Paid	(c) "Cash dividends" from CFCs		(d) Check box if a section 965(a)(2) amount	(e) Column (c)(2) line amounts the corporation specifically identifies as qualifying dividends (see instructions)
		(1) Functional Currency	(2) U.S. Dollars		
40				☐	
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Totals . . . . ▶					

| **Part VI** | Section 965(b)(2) Base Period Amount (see instructions) |

See instructions if the corporation has fewer than 5 tax years in its base period.

Tax Years in Base Period	(a) Section 965(b)(2)(B)(i) dividends	(b) Section 965(b)(2)(B)(ii) inclusions	(c) Section 965(b)(2)(B)(iii) distributions	(d) Total. Add columns (a) through (c)
41 Most recent tax year ending on or before June 30, 2003				
42 Tax year prior to line 41 year				
43 Tax year prior to line 42 year				
44 Tax year prior to line 43 year				
45 Tax year prior to line 44 year				

46	Add lines 41 through 45, column (d)	46	
47	Enter the largest of lines 41 through 45, column (d)	47	
48	Enter the smallest of lines 41 through 45, column (d)	48	
49	Add lines 47 and 48	49	
50	Subtract line 49 from line 46.	50	
51	Divide line 50 by 3. (See instructions if the corporation has fewer than 5 tax years in its base period.) Enter the result here and on page 1, line 4	51	

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