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If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

Transfer Price or Commission

For amount reported on line _____, Schedule _____, Form 1120-FSC.

OMB No. 1545-0935

▶ **Attach Schedule P to Form 1120-FSC.**

Name as shown on Form 1120-FSC A Product or product line (see instructions) C Principal business activity code (if applicable) (see instructions)	Employer identification number B Basis of reporting (see instructions): 1. Transaction-by-transaction: a. Aggregate on Schedule P <input type="checkbox"/> b. Aggregate on tabular schedule <input type="checkbox"/> c. Tabular schedule of transactions <input type="checkbox"/> 2. Group of transactions <input type="checkbox"/>
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Part I FSC Profit

Section A—Combined Taxable Income (see instructions)

Full Costing

1 Foreign trading gross receipts from transaction between FSC or related supplier and third party		1	
2 Costs and expenses allocable to foreign trading gross receipts from transaction:			
a Cost of goods sold attributable to property if sold, or depreciation attributable to property if leased	2a		
b Related supplier's expenses allocable to foreign trading gross receipts (see instructions)	2b		
c FSC's expenses allocable to foreign trading gross receipts	2c		
d Add lines 2a through 2c		2d	
3 Combined taxable income. Subtract line 2d from line 1. If zero or less, enter -0-		3	

Marginal Costing

4 Foreign trading gross receipts from resale by FSC, or sale by related supplier, to third party		4	
5 Costs and expenses allocable to foreign trading gross receipts from sale:			
a Cost of direct material attributable to property sold	5a		
b Cost of direct labor attributable to property sold	5b		
c Add lines 5a and 5b		5c	
6 Subtract line 5c from line 4. If zero or less, skip lines 7 through 11 and enter -0- on line 12		6	
7 Gross receipts of related supplier and FSC or controlled group from foreign and domestic sales of the product or product line		7	
8 Costs and expenses of related supplier and FSC or controlled group allocable to gross income from sales:			
a Cost of goods sold attributable to property sold	8a		
b Expenses allocable to gross income	8b		
c Add lines 8a and 8b		8c	
9 Subtract line 8c from line 7. If zero or less, skip lines 10 and 11 and enter -0- on line 12		9	
10 Overall profit percentage. Divide line 9 by line 7. Check if the controlled group optional method is used. ▶ <input type="checkbox"/>		10	%
11 Overall profit percentage limitation. Multiply line 4 by line 10.		11	
12 Combined taxable income. Enter the smaller of line 6 or line 11		12	

Section B—23% of Combined Taxable Income Method (see instructions)

13 Multiply line 3 or line 12 (as elected by related supplier) by 23%		13	
14 FSC profit. Enter amount from line 13. If marginal costing is used, enter the smaller of line 3 or line 13.		14	

Section C—1.83% of Foreign Trading Gross Receipts Method (see instructions)

15 Multiply line 1 by 1.83%		15	
16 Multiply line 3 or line 12 (as elected by related supplier) by 46%		16	
17 FSC profit. Enter the smallest of line 3, line 15, or line 16		17	

Part II Transfer Price From Related Supplier to FSC

18 Enter amount from line 1 or line 4, whichever is applicable		18	
19a FSC profit. Enter amount from line 14 or line 17, whichever is applicable	19a		
b FSC expenses allocable to foreign trading gross receipts from transaction	19b		
c Add lines 19a and 19b		19c	
20 Transfer price from related supplier to FSC. Subtract line 19c from line 18 (see instructions)		20	

Part III FSC Commission From Related Supplier

21 FSC profit. Enter amount from line 14 or line 17, whichever is applicable		21	
22 FSC expenses allocable to foreign trading gross receipts from transaction		22	
23 FSC commission from related supplier. Add lines 21 and 22 (see instructions).		23	