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DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 1

[TD 9866]

RIN 1545-BO54; 1545-BO62

Guidance Related to Section 951A (Global Intangible Low-Taxed Income) and Certain Guidance Related to Foreign Tax Credits

Correction

In rule document 2019-12437, appearing on pages 29288 through 29370, in the issue of Friday, June 21, 2019 make the following corrections:

1. On page 29337, Table 1 to paragraph (b)(2)(iv)(B) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(iv)(B)

M's subpart F income for Year 1	\$100x
Less: Reduction under section 951(a)(2)(A) for period (1-1 through 5-26) during which M is not a controlled foreign corporation (\$100x × 146/365)	40x
Subpart F income for Year 1 as limited by section 951(a)(2)(A)	60x
A's pro rata share of subpart F income as determined under section 951(a)(2)(A) (0.6 × \$60x)	36x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of M acquired by A:	
(i) Dividend received by B (\$15x), multiplied by a fraction (\$100x/\$100x), the numerator of which is the subpart F income of such corporation for the taxable year (\$100x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year (\$100x) (\$15x × (\$100x/\$100x))	15x

TABLE 1 TO PARAGRAPH (b)(2)(iv)(B)—Continued

(ii) B's pro rata share (60%) of the amount which bears the same ratio to the subpart F income of such corporation for the taxable year (\$100x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year (146/365) (0.6 × \$100x × (146/365))	24x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii))	15x
A's pro rata share of subpart F income as determined under section 951(a)(2)	21x

2. On page 29338, Table 1 to paragraph (b)(2)(vi)(B)(1) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(vi)(B)(1)

R's subpart F income for Year 1	\$100x
Less: Reduction under section 951(a)(2)(A) for period (1-1 through 3-14) during which R is not a controlled foreign corporation (\$100x × 73/365)	20x
Subpart F income for Year 1 as limited by section 951(a)(2)(A)	80x
A's pro rata share of subpart F income as determined under section 951(a)(2)(A) (0.6 × \$80x)	48x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of R indirectly acquired by A:	
(i) Dividend received by B (\$100x) multiplied by a fraction (\$100x/\$400x), the numerator of which is the subpart F income of such corporation for the taxable year (\$100x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year (\$400x) (\$100x × (\$100x/\$400x))	25x
(ii) B's pro rata share (60%) of the amount which bears the same ratio to the subpart F income of such corporation for the taxable year (\$100x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year (73/365) (0.6 × \$100x × (73/365))	12x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii))	12x
A's pro rata share of subpart F income as determined under section 951(a)(2)	36x

3. On the same page, Table 1 to paragraph (b)(2)(vi)(B)(2) should appear as follows:

TABLE 1 TO PARAGRAPH (b)(2)(vi)(B)(2)

R's tested income for Year 1	\$300x
Less: Reduction under section 951(a)(2)(A) for period (1-1 through 3-14) during which R is not a controlled foreign corporation (\$300x × 73/365)	60x
Tested income for Year 1 as limited by under section 951(a)(2)(A)	240x
A's pro rata share of tested income as determined under § 1.951A-1(d)(2) (0.6 × \$240x)	144x
Less: Reduction under section 951(a)(2)(B) for dividends received by B during Year 1 with respect to the stock of R indirectly acquired by A:	
(i) Dividend received by B (\$100x) multiplied by a fraction (\$300x/\$400x), the numerator of which is the tested income of such corporation for the taxable year (\$300x) and the denominator of which is the sum of the subpart F income and the tested income of such corporation for the taxable year (\$400x) (\$100x × (\$300x/\$400x))	75x
(ii) B's pro rata share (60%) of the amount which bears the same ratio to the tested income of such corporation for the taxable year (\$300x) as the part of such year during which A did not own (within the meaning of section 958(a)) such stock bears to the entire taxable year (73/365) (0.6 × \$300x × (73/365))	36x
(iii) Amount of reduction under section 951(a)(2)(B) (lesser of (i) or (ii))	36x
A's pro rata share of tested income under section 951A(e)(1)	108x

[FR Doc. C1-2019-12437 Filed 8-22-19; 8:45 am]

BILLING CODE 1300-01-D

DEPARTMENT OF HOMELAND SECURITY

Coast Guard

33 CFR Part 165

[Docket Number USCG-2019-0662]

RIN 1625-AA00

Safety Zone; Tennessee River, Kentucky Dam Marina Fireworks, Gilbertsville, KY

AGENCY: Coast Guard, DHS.

ACTION: Temporary final rule.

SUMMARY: The Coast Guard is establishing a temporary safety zone for certain waters of the Tennessee River.

This action is necessary to ensure safety of life on these navigable waters immediately prior to, during, and after a pyrotechnics display near Kentucky Dam Marina, Gilbertsville, KY. Entry of vessels or persons into this zone is prohibited unless specifically authorized by the Captain of the Port Sector Ohio Valley or a designated representative.

DATES: This rule is effective from 8:45 p.m. to 10 p.m. on August 31, 2019.

ADDRESSES: To view documents mentioned in this preamble as being available in the docket, go to <https://www.regulations.gov>, type USCG-2019-0662 in the "SEARCH" box and click "SEARCH." Click on Open Docket Folder on the line associated with this rule.

FOR FURTHER INFORMATION CONTACT: If you have questions about this proposed rulemaking, call or email MST2 Dylan Caikowski, MSU Paducah, U.S. Coast Guard; telephone 270-442-1621 ext. 2120, email STL-SMB-MSUPaducah-WWM@uscg.mil.

SUPPLEMENTARY INFORMATION:

I. Table of Abbreviations

CFR Code of Federal Regulations
 DHS Department of Homeland Security
 FR Federal Register
 NPRM Notice of proposed rulemaking
 § Section
 U.S.C. United States Code

II. Background Information and Regulatory History

The Coast Guard is issuing this temporary rule without prior notice and opportunity to comment pursuant to authority under section 4(a) of the Administrative Procedure Act (APA) (5 U.S.C. 553(b)). This provision authorizes an agency to issue a rule without prior notice and opportunity to comment when the agency for good cause finds that those procedures are "impracticable, unnecessary, or contrary to the public interest." Under 5 U.S.C. 553(b)(B), the Coast Guard finds that good cause exists for not publishing a notice of proposed rulemaking (NPRM) with respect to this rule because doing so would be impracticable. It is impracticable to publish an NPRM because this safety zone must be established by August 31, 2019 and we lack sufficient time to provide a reasonable comment period and then consider those comments before issuing the rule.

Under 5 U.S.C. 553(d)(3), the Coast Guard finds that good cause exists for making this rule effective less than 30 days after publication in the **Federal Register**. Delaying the effective date of

this rule would be contrary to the public interest because immediate action is needed to protect the public from the potential safety hazards associated with a pyrotechnics display.

III. Legal Authority and Need for Rule

The Coast Guard is issuing this rule under authority in 46 U.S.C. 70034 (previously 33 U.S.C. 1231). The Captain of the Port Sector Ohio Valley (COTP) has determined that potential hazards associated with a pyrotechnics display on August 31, 2019, will be a safety concern for anyone within a 350-foot radius of the pyrotechnics display. This rule is needed to protect personnel on the navigable waters within the safety zone prior to, during, and after a pyrotechnics display.

IV. Discussion of the Rule

This rule establishes a safety zone from 8:45 p.m. until 10 p.m. on August 31, 2019. The safety zone will cover all navigable waters within a 350-foot radius from the pyrotechnics launch site at the entrance to Kentucky Dam Marina at mile marker 22.6 on the Tennessee River. The duration of the zone is intended to protect personnel and vessels in these navigable waters prior to, during, and after a pyrotechnic display. No vessel or person will be permitted to enter the safety zone without obtaining permission from the COTP or a designated representative.

V. Regulatory Analyses

We developed this rule after considering numerous statutes and Executive orders related to rulemaking. Below we summarize our analyses based on a number of these statutes and Executive orders, and we discuss First Amendment rights of protestors.

A. Regulatory Planning and Review

Executive Orders 12866 and 13563 direct agencies to assess the costs and benefits of available regulatory alternatives and, if regulation is necessary, to select regulatory approaches that maximize net benefits. Executive Order 13771 directs agencies to control regulatory costs through a budgeting process. This rule has not been designated a "significant regulatory action," under Executive Order 12866. Accordingly, this rule has not been reviewed by the Office of Management and Budget (OMB), and pursuant to OMB guidance it is exempt from the requirements of Executive Order 13771.

This regulatory action determination is based on the size, location, duration, and time-of-day of the safety zone. Vessel traffic will be able to safely

transit around this safety zone, which will impact a 350-foot radius designated area of the Tennessee River for one hour and fifteen minutes on August 31, 2019. Moreover, the Coast Guard will issue a Broadcast Notice to Mariners (BNMs) via VHF-FM marine channel 16 to inform mariners about the zone, and the rule allows vessels to seek permission to enter the zone.

B. Impact on Small Entities

The Regulatory Flexibility Act of 1980, 5 U.S.C. 601-612, as amended, requires Federal agencies to consider the potential impact of regulations on small entities during rulemaking. The term "small entities" comprises small businesses, not-for-profit organizations that are independently owned and operated and are not dominant in their fields, and governmental jurisdictions with populations of less than 50,000. The Coast Guard certifies under 5 U.S.C. 605(b) that this rule will not have a significant economic impact on a substantial number of small entities.

While some owners or operators of vessels intending to transit the safety zone may be small entities, for the reasons stated in section V.A above, this rule will not have a significant economic impact on any vessel owner or operator.

Under section 213(a) of the Small Business Regulatory Enforcement Fairness Act of 1996 (Pub. L. 104-121), we want to assist small entities in understanding this rule. If the rule would affect your small business, organization, or governmental jurisdiction and you have questions concerning its provisions or options for compliance, please call or email the person listed in the **FOR FURTHER INFORMATION CONTACT** section.

Small businesses may send comments on the actions of Federal employees who enforce, or otherwise determine compliance with, Federal regulations to the Small Business and Agriculture Regulatory Enforcement Ombudsman and the Regional Small Business Regulatory Fairness Boards. The Ombudsman evaluates these actions annually and rates each agency's responsiveness to small business. If you wish to comment on actions by employees of the Coast Guard, call 1-888-REG-FAIR (1-888-734-3247). The Coast Guard will not retaliate against small entities that question or complain about this rule or any policy or action of the Coast Guard.

C. Collection of Information

This rule will not call for a new collection of information under the

Paperwork Reduction Act of 1995 (44 U.S.C. 3501–3520).

D. Federalism and Indian Tribal Governments

A rule has implications for federalism under Executive Order 13132, Federalism, if it has a substantial direct effect on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government. We have analyzed this rule under that Order and have determined that it is consistent with the fundamental federalism principles and preemption requirements described in Executive Order 13132.

Also, this rule does not have tribal implications under Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, because it does not have a substantial direct effect on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes. If you believe this rule has implications for federalism or Indian tribes, please call or email the person listed in the **FOR FURTHER INFORMATION CONTACT** section above.

E. Unfunded Mandates Reform Act

The Unfunded Mandates Reform Act of 1995 (2 U.S.C. 1531–1538) requires Federal agencies to assess the effects of their discretionary regulatory actions. In particular, the Act addresses actions that may result in the expenditure by a State, local, or tribal government, in the aggregate, or by the private sector of \$100,000,000 (adjusted for inflation) or more in any one year. Though this rule will not result in such an expenditure, we do discuss the effects of this rule elsewhere in this preamble.

F. Environment

We have analyzed this rule under Department of Homeland Security Directive 023–01 and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321–4370f), and have determined that this action is one of a category of actions that do not individually or cumulatively have a significant effect on the human environment. This rule involves a safety zone lasting only one hour and fifteen minutes that will prohibit the entry of vessels and persons within a 350-foot radius of the entrance to Kentucky Dam Marina at mile marker 22.6 on the

Tennessee River in Gilbertsville, KY. It is categorically excluded from further review under paragraph L60(a) in Table 3–1 of U.S. Coast Guard Environmental Planning Implementing Procedures. A Record of Environmental Consideration supporting this determination is available in the docket where indicated under **ADDRESSES**.

G. Protest Activities

The Coast Guard respects the First Amendment rights of protesters. Protesters are asked to call or email the person listed in the **FOR FURTHER INFORMATION CONTACT** section to coordinate protest activities so that your message can be received without jeopardizing the safety or security of people, places or vessels.

List of Subjects in 33 CFR Part 165

Harbors, Marine safety, Navigation (water), Reporting and recordkeeping requirements, Security measures, Waterways.

For the reasons discussed in the preamble, the Coast Guard amends 33 CFR part 165 as follows:

PART 165—REGULATED NAVIGATION AREAS AND LIMITED ACCESS AREAS

- 1. The authority citation for part 165 continues to read as follows:

Authority: 46 U.S.C. 70034, 70051; 33 CFR 1.05–1, 6.04–1, 6.04–6, and 160.5; Department of Homeland Security Delegation No. 0170.1.

- 2. Add § 165.T08–0662 to read as follows:

§ 165.T08–0662 Safety Zone; Tennessee River, Kentucky Dam Marina Fireworks, Gilbertsville, KY.

(a) *Location.* The safety zone will cover all navigable waters of the Tennessee River at mile marker 22.6 within a 350-foot radius from the fireworks launch site on the Kentucky Dam Marina break wall in Gilbertsville, KY.

(b) *Enforcement period.* This section will be enforced from 8:45 p.m. until 10 p.m. on August 31, 2019.

(c) *Regulations.* (1) In accordance with the general regulations in § 165.23 of this part, entry into this zone is prohibited unless authorized by the Captain of the Port Sector Ohio Valley (COTP) or a designated representative.

(2) Persons or vessels desiring to enter into or pass through the zone must request permission from the COTP or a designated representative. They may be contacted on VHF–FM Channel 16 or by phone at 502–779–5400.

(3) If permission is granted, all persons and vessels must transit at their

slowest safe speed and comply with all lawful directions issued by the COTP or a designated representative.

(d) *Informational broadcasts.* The COTP or a designated representative will issue Broadcast Notice to Mariners (BNMs) via VHF–FM marine channel 16 to inform mariners about the zone, and the rule allows vessels to seek permission to enter the zone.

M.A. Wike,

Commander, U.S. Coast Guard, Acting Captain of the Port, Sector Ohio Valley.

[FR Doc. 2019–18248 Filed 8–22–19; 8:45 am]

BILLING CODE 9110–04–P

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 1, 21, 35, 49, 52, 59, 60, 61, 62, 63, 65, 82, 147, 272, 282, 374, 707, and 763

[FRL–9998–08–Region 6]

Regional Office Address

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule; technical amendments.

SUMMARY: The Environmental Protection Agency (EPA) is amending its regulations to reflect a change in address and organization names for EPA's Region 6 office. This action is editorial in nature and is intended to provide accuracy and clarity to EPA's regulations.

DATES: This rule is effective on August 23, 2019.

ADDRESSES: EPA Region 6, 1201 Elm Street, Suite 500, Dallas, Texas 75270–2102.

FOR FURTHER INFORMATION CONTACT: Carl Young, EPA Region 6, 214–665–6645, young.carl@epa.gov.

SUPPLEMENTARY INFORMATION: This rule makes editorial changes to various environmental regulations in title 40 of the Code of Federal Regulations (CFR) to reflect a change in address and organization names for the Region 6 office. It does not otherwise impose or amend any requirements. Pursuant to 5 U.S.C. 533 (b)(3)(B) of the Administrative Procedure Act (APA), EPA has found that the public notice and comment provisions of the APA, found at 5 U.S.C. 553(b), do not apply to this rulemaking as public notice and comment is unnecessary because this amendment to the regulations provides only technical changes to update an address or an organization name. EPA has also determined that there is good