## Part I Deductions Directly Allocated and Apportioned to ECI and Non-ECI

Note. Enter all amounts in Part I in only U.S. dollars or in only functional currency. If U.S. dollars, check box $\square$. Otherwise, specify currency
1 Total expenses on the books of the home office
2 Adjustments for U.S. tax principles (attach schedule - see instructions)
3 Total adjusted deductions on the books of the home office. Combine lines 1
4 Interest expense (included in line 3)
5 Bad debt expense (included in line 3)
6 Total of interest expense and bad debt expense. Add lines 4 and 5.
7 Remaining deductions from line 3. Subtract line 6 from line 3
8 Deductions directly allocable to non-effectively connected income from subsidiaries
9 Deductions directly allocable to other non-effectively connected income booked in the home country
10 Deductions directly allocable to other non-effectively connected income booked in other countries (including the United States)
11 Add lines 8 through 10 .
12 Remaining deductions on the books of the home office allocable under Regulations section 1.861-8. Subtract line 11 from line 7

13 Less: Deductions directly allocated to effectively connected income
14 Remaining deductions on the books of the home office indirectly allocable under Regulations section 1.861-8. Subtract line 13 from line 12


Part II Home Office Deductions Indirectly Allocated and Apportioned to ECI and Non-ECI Note. Enter the amounts in Part II, lines 16 through 21, in U.S. dollars.
15 Average exchange rate used to convert allocable deductions to U.S. dollars (see instructions)
16 Deductions indirectly allocable under Regulations section 1.861-8. Enter the amount from line 14 in U.S. dollars. If line 14 is stated in functional currency, multiply line 14 by line 15
17 Indirect allocation and apportionment of line 16 amount to ECI (attach computation).
18 Deductions directly allocated to ECI from line 13, in U.S. dollars. If stated in foreign currency, multiply line 13 by line 15
19 Total home office deductions allocated to effectively connected income. Add lines 17 and 18
20 Total deductions from other non-U.S. locations allocated and apportioned to effectively connected income

| 15 |  |
| :--- | :--- |
| 16 |  |
| 17 |  |
| 18 |  |
| 19 |  |
| 20 |  |
| 21 |  |

21 Total deductions allocated and apportioned to effectively connected income. Add lines 19 and 20 and enter the amount here and on Form 1120F, section II, line 26
Part III Indirect Allocation and Apportionment Methods and Financial Records
Note. Enter the amounts in Part III, lines 22a, 22b, 23a, 23b, and 25 (if applicable), in U.S. dollars.

- If one or more methods used are different than in prior year, check box
- If any amount on line 21 is recorded as an interbranch amount on books and records used to prepare Form 1120F, Schedule L, include on Part IV, line 36 and check box
22 Gross Income Ratio:
a Effectively connected gross income
b Worldwide gross income
c Divide line 22a by line 22b
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$\qquad$

23 Gross Asset Ratio:
a Average U.S. assets from Schedule I, line 5, column (d)
b Worldwide assets (if applicable, from Schedule I, line 6b)
c Divide line 23a by line 23b


24 Number of Personnel:
a Personnel of U.S. trade or business within the United States.
b Worldwide personnel of foreign corporation
c Divide line 24a by line 24b


25 Other ratio based methods (attach schedule)
26 Other methods (e.g., time spent analysis) (attach schedule)


## Part IV Allocation and Apportionment of Deductions on Books and Records Used to Prepare Form 1120F, Schedule L Note. Enter all amounts in Part IV in U.S. dollars.

30 Total expenses per books and records used to prepare Form 1120F, Schedule L

31 Adjustments for U.S. tax principles (attach schedule - see instructions)

32 Total deductions per line 30 books and records. Combine lines 30 and 31

33a Third party interest expense per books and records
b Interbranch interest expense per books and records

34 Bad debt expense per books and records
35 Other third party deductions not allocable (attach schedule)

36 Interbranch expenses per books not included on line 33b (attach schedule).
37 Add lines 33a through 36
38 Deductions on books and records allocable and apportionable under Regulations section 1.861-8. Subtract line 37 from line 32
$\square$

| 33 a |  |  |
| :---: | :---: | :---: |
| 33 b |  |  |
| 34 |  |  |
| 35 |  |  |
| 36 |  |  |


| Reconciliation of allocable expenses on books under Reg. 1.861-8 (from li |  | (a) <br> ECI Amounts | (b) <br> Non-ECI Amounts | (c) <br> Total: Add columns (a) and (b) |
| :---: | :---: | :---: | :---: | :---: |
| 39a Derivative transaction deductions directly allocated under section 1.861-8 (from line 38) | 39a |  |  |  |
| b Other deductions directly allocated and apportioned | 39b |  |  |  |
| 40 Total expenses directly allocated and apportioned. Add lines 39a and 39b | 40 |  |  |  |
| 41 Deductions on books and records indirectly allocated and apportioned | 41 |  |  |  |
| 42 Total deductions allocated and apportioned. Add lines 40 and 41. Column (c) must equal line 38 | 42 |  |  |  |

Note. Line 42, column (a) is the total of the deductions reported on Form 1120F, Section II, lines 12, 13, 14, 16, 17, 19, 20, 21, 22, 23, 24, 25, and 27.

