



[4830-01-P]

Department of the Treasury

Internal Revenue Service

26 CFR Parts 1

[TD 9623]

RIN 1545–BI99

Application of Section 108(i) to Partnerships and S Corporations; Correcting Amendment

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Correcting amendment.

SUMMARY: This document contains a correction to final regulations and removal of temporary regulations (T.D. 9623) that were published in the **Federal Register** on Wednesday, July 3, 2013. The final regulations relate to the application of section 108(i) of the Internal Revenue Code to partnerships and S corporations and provide rules regarding the deferral of discharge of indebtedness income and original issue discount deductions by a partnership or an S corporation with respect to reacquisitions of applicable debt instruments after December 31, 2008, and before January 1, 2011.

DATES: This correction is effective on **[INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER]**, and is applicable on or after July 2, 2013.

FOR FURTHER INFORMATION CONTACT: Mary Beth Carchia at (202) 317-5279 (not a toll-free number).

SUPPLEMENTARY INFORMATION:

**Background**

The final regulations and removal of temporary regulations (T.D. 9623) that is the subject of this correction are under section 108(i) of the Internal Revenue Code.

### **Need for Correction**

As published July 3, 2013 (78 FR 39973), the final regulations and removal of temporary regulations (T.D. 9623) contain an error that may prove to be misleading and needs clarification.

### **List of Subjects in 26 CFR Part 1**

Income taxes, Reporting and recordkeeping requirements.

### **Correction of Publication**

Accordingly, 26 CFR part 1 is corrected by making the following correcting amendment:

#### **PART 1 – INCOME TAXES**

Paragraph 1. The authority citation for part 1 is amended by removing the sectional authority for §1.108(i)-2T to read in part as follows:

Authority: 26 U.S.C. 7805, unless otherwise noted.

\* \* \* \* \*

Martin V. Franks  
Chief, Publications and Regulations Branch  
Legal Processing Division  
Associate Chief Counsel  
(Procedure and Administration)