#### From the President, Bloomberg Tax



**Lisa Fitzpatrick**President,
Bloomberg Tax

There has been a veritable alphabet soup borne out of BEPS and U.S. tax reform – from MLI to BEAT to GILTI... And nowhere is the impact of these changes, including recently released regulations, being felt greater than on multinational organizations. How is Bloomberg Tax helping our subscribers navigate the increasingly complex international tax landscape? Let me count the ways...

- 1. We've recently introduced a number of MLI enhancements available to our International Tax subscribers, including:
  - NEW MLI Watch landing page that provides access to all of our MLI coverage in one place
  - A Multilateral Instrument Tool detailing jurisdictions' status and MLI Positions
  - Alerts and editorial guidance within affected treaties, allowing users to understand the MLI's implications on individual agreements
  - English-language versions of each signatory country's reservations and notifications
- A BEAT Calculator to calculate the base erosion minimum tax amount (BEMTA). This new tool saves time by enabling you to easily compute the BEMTA by entering the components of the calculation into an easy-tofollow interface.
- 3. New Jumpstart podcasts on Section 965 and GILTI, with a BEAT episode coming soon.

We are excited to be showcasing these enhancements at the 72nd International Fiscal Association Congress in Seoul, where thousands of tax practitioners from around the globe will be convening to discuss the digital economy, the impact of tax reform on non-U.S. companies, and more. Be on the lookout for daily news coverage from this conference in **Daily Tax Report: International**.

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- 537: Qualified Business Income Deduction: Section 199A
- 5163: Foreign Currency Transactions and Translations
- 6650: Dual Consolidated Losses

## ■ REVISED

- 768-4th: Stock Sales Subject to Section 304
- 808-4th: Estate Planning for Corporate Executives
- 1340-2nd: Sales and Use Taxes: Drop Shipment Transactions
- 5136-3rd: Contingent Environmental Liabilities: Disclosures and Accounting
- 5503-3rd: Managing Legal Risk in the Financial Reporting Process

## → PRODUCT ENHANCEMENTS

## **Country Guides**

The Global Tax Guide has a new name: **Country Guides**. This change better represents the comprehensive scope of our international content and makes it easier for you to navigate to the compliance information you need for your research.

#### **BEAT Calculator**

The Bloomberg Tax BEAT Calculator saves time by enabling you to easily compute the BEMTA by entering the components of the calculation into an easy-to-follow interface. You can input any relevant credits, various streams of income, and deductions into preset fields, which are readily available for editing to see the impact that changed values would have on your minimum tax.



## ★ TAX REFORM WATCH: POST-ENACTMENT

Provides the latest information about tax reform legislation through our Roadmap, Daily Tax Report® articles, the latest bill text, client letters, and alerts posted alongside key IRC and Tax Management Portfolio sections.



## SPECIAL REPORTS

## Alimony, Prenuptial Agreements, and Trusts Under the 2017 Tax Act

Bloomberg Tax

**Alimony, Prenuptial** Agreements, and Trusts Under the 2017 Tax Act

As with many large tax overhauls, sometimes lesser publicized changes also have a significant impact on taxpayers. With the 2017 tax act, some of these lesser publicized changes involve the income tax impact of divorce, and, even though the changes do not take effect until 2019, the effects can be far-reaching.



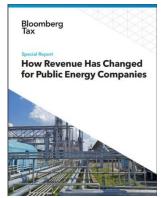
## **Section 965: Understanding the Transition Tax**

Bloomberg Tax

Section 965: Understanding the Transition Tax

This report includes news and analysis from Bloomberg Tax, breaking down the transition tax rules and providing a look into what to expect on these issues in the coming months.

## **How Revenue Has Changed for Public Energy Companies**



This report focuses on those items in the new model that will have the greatest effect on energy companies and includes all subsequent amendments, Transition Resource Group (TRG) clarifications, finalized and exposed guidance from the AICPA's revenue recognition oil and gas (O&G) task force, and SEC views gathered from official speeches.

#### **Opportunity Zone Programs: Overview and FAQs**



A new Opportunity Zone program was included in the 2017 tax act to encourage investment in low-income community businesses. This special report explores several practical questions that have been raised by potential investors and project owners that must be resolved for taxpayers to take full advantage of the program and speculates on guidance that may be forthcoming.

## **Unscrambling State Online Sales Taxation After 'Wayfair'**



This report includes three primers from our team, breaking down specifics of stateside responses and providing a look into what to expect in the post—Wayfair decision world.

# JUMPSTART PODCASTS

Jumpstart is a new podcast series from the Bloomberg Tax editorial team that discusses tax law changes made by the 2017 tax reform act.



- Like-Kind Exchanges Under IRC Code Section 1031
- GILTI
- Business Interest Limitation
- Deferred Foreign Income Treatment (Section 965)
- Tax Accounting Changes



## TALKING TAX PODCASTS

The Talking Tax podcast series covers tax issues from Capitol Hill to the courts and the IRS.



- Do Proposed Regulations for §199A Provide Clarity for Business Owners?
- Career Tips From 2 of Accounting's Most Powerful Women
- How the 2017 Tax Act Affects Alimony, Prenups, and Trusts (Part 1)
- Talking Tax Episode 74 How the 2017 Tax Act Affects Alimony, Prenups, and Trusts (Part 2)



#### **Tax Leadership Forum**

November 29, 2018 8:00 am - 5:00 pm National Press Club Washington, D.C.

Bloomberg Tax presents the Bloomberg Tax Leadership Forum, an annual forum for senior business executives who need to plan for their businesses' growth strategy and fiscal soundness in the coming year.

As always, Bloomberg Tax will leverage the best of tax, trade, and regulatory reporting and analysis, as it showcases conversations between key U.S. and international policy makers, tax and regulatory experts, and leading corporate executives. All just a few days after the midterm elections!

Join fellow CFOs, VPs of tax, and general tax counsel for timely and highly relevant discussions ranging from the impact of tax reform on trade to taxation in the digital economy to what you can expect to see in 2019 both here and abroad.

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