

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

CAROLINE L. HARRIS

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September 27, 2018

CC:PA:LPD:PR
REG-107892-18
Room 5203
Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, D.C., 20044

Submitted via Federal eRulemaking Portal

RE: Comments on REG-107892-18 (Proposed Regulations on New 20 Percent Deduction for Pass-Through Businesses)

Dear Sir or Madam:

The U.S. Chamber of Commerce appreciates the opportunity to provide feedback on REG-107892-18, as published in the Federal Register on August 8, 2018.

The attached chart identifies issues arising under REG-107892-18 and provides suggested solutions as well as additional explanation the Chamber believe would be helpful in addressing the issue. This feedback is the product of extensive conversations with a very wide array of affected Chamber members. You may consider these comments as representing some of the most serious issues, but are not all the issues concerning Chamber members on REG-107892-18.

The Chamber strongly urges Treasury and the I.R.S. to work closely with the business community to implement the recent tax changes in a manner that would ensure as little disruption as possible to normal business operations and encourage the U.S. economy to achieve its true growth potential. The Chamber looks forward to working with you to address these and other issues as you work to implement the new, pro-growth tax code. Thank you for your time and attention.

Sincerely,



Caroline L. Harris

CC: Frank J. Fisher, Attorney, (Passthroughs and Special Industries Division), Office of Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

Wendy L. Kribell, Assistant to the Branch Chief, Branch 1, (Passthroughs and Special Industries Division) Office of Associate Chief Counsel, Internal Revenue Service, U.S. Department of the Treasury

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