Controlling Corporation's Basis Adjustment in its Controlled Corporation's Stock Following a Triangular Reorganization; Correction

Announcement 96–36

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Correction to final regulations.

SUMMARY: This document contains a correction to final regulations [TD 8648 [1996–10 I.R.B. 23]] which were published in the Federal Register for Thursday, December 21, 1995 (60 FR 66077). The final regulations relate to the rules for adjusting the basis of a

controlling corporation in the stock of a controlled corporation as the result of certain triangular reorganizations involving the stock of the controlling corporation.

EFFECTIVE DATE: December 21, 1995.

FOR FURTHER INFORMATION CONTACT: Curt Cutting, (202) 622-7550 (not a toll-free number).

SUPPLEMENTARY INFORMATION:

Background

The final regulations that are the subject of this correction are under sections 358, 1032, and 1502 of the Internal Revenue Code.

Need for Correction

As published, TD 8648 contains a typographical error that is in need of clarification.

Correction of Publication

Accordingly, the publication of the final regulations which are the subject of FR Doc. 95–30875, is corrected as follows:

§ 1.358-6 [Corrected]

On page 66080, column 3, § 1.358-6

(c)(4), in paragraph (d) of *Example 2.*, line 9, the language "Under 1.358–6 (c)(2)(i)(A), *P*'s basis in its *T*" is corrected to read "Under § 1.358–6 (c)(2)(i)(A), *P*'s basis in its *T*."

Cynthia E. Grigsby, Chief, Regulations Unit, Assistant Chief Counsel (Corporate).

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