

**Schedule J
(Form 1118)**

(Rev. January 1999)

Department of the Treasury
Internal Revenue Service

Name of corporation

Adjustments to Separate Limitation Income (Loss) Categories for Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances, and Overall Foreign Loss Account Balances

For calendar year, or other tax year beginning, and ending

▶ **Attach to Form 1118. For Paperwork Reduction Act Notice, see the separate Instructions for Form 1118.**

OMB No. 1545-0122

Employer identification number

Part I Adjustments to Separate Limitation Income or (Losses) in Determining Numerators of Limitation Fractions

| | (i) General limitation income | (ii) Passive income | (iii) High withholding tax interest | (iv) Financial services income | (v) Shipping income | (vi) Dividends from a DISC or former DISC | (vii) Taxable income attributable to foreign trade income | (viii) Certain distributions from a FSC or former FSC | (ix) Dividends from noncontrolled section 902 corporation* | (x) Other income* |
|--|--|---------------------------|--|---|---------------------------|--|---|---|--|-------------------------|
| 1 Income or (loss) before adjustments (see instructions). | | | | | | | | | | |
| 2 Allocation of current year separate limitation losses (see instructions): | | | | | | | | | | |
| a General limitation income | () | () | () | () | () | () | () | () | () | () |
| b Passive income | () | () | () | () | () | () | () | () | () | () |
| c High withholding tax interest | () | () | () | () | () | () | () | () | () | () |
| d Financial services income | () | () | () | () | () | () | () | () | () | () |
| e Shipping income | () | () | () | () | () | () | () | () | () | () |
| f Dividends from a DISC or former DISC | () | () | () | () | () | () | () | () | () | () |
| g Taxable income attributable to foreign trade income | () | () | () | () | () | () | () | () | () | () |
| h Certain distributions from a FSC or former FSC | () | () | () | () | () | () | () | () | () | () |
| i Dividends from noncontrolled section 902 corporation* | () | () | () | () | () | () | () | () | () | () |
| j Other Income* | () | () | () | () | () | () | () | () | () | () |
| 3 Subtotal —Combine lines 1 through 2j. | | | | | | | | | | |
| 4 Overall foreign losses | | | | | | | | | | |
| 5 Recapture of overall foreign losses | | | | | | | | | | |
| 6 Subtotal —Subtract line 5 from line 3. | | | | | | | | | | |
| 7 Recharacterization of separate limitation income (see instructions): | | | | | | | | | | |
| a General limitation income | () | | | | | | | | | |
| b Passive income | | () | | | | | | | | |
| c High withholding tax interest | | | () | | | | | | | |
| d Financial services income | | | | () | | | | | | |
| e Shipping income | | | | | () | | | | | |
| f Dividends from a DISC or former DISC | | | | | | () | | | | |
| g Taxable income attributable to foreign trade income | | | | | | | () | | | |
| h Certain distributions from a FSC or former FSC | | | | | | | | () | | |
| i Dividends from noncontrolled section 902 corporation* | | | | | | | | | () | |
| j Other Income* | | | | | | | | | | () |
| 8 Subtotal —Combine lines 6 through 7j. | | | | | | | | | | |

* **Important:** See *Computer-Generated Schedule J* in instructions.

| | (i) General limitation income | (ii) Passive income | (iii) High withholding tax interest | (iv) Financial services income | (v) Shipping income | (vi) Dividends from a DISC or former DISC | (vii) Taxable income attributable to foreign trade income | (viii) Certain distributions from a FSC or former FSC | (ix) Dividends from noncontrolled section 902 corporation* | (x) Other income* |
|---|--|---------------------------|--|---|---------------------------|--|---|---|--|-------------------------|
| 9 Subtotal —Enter amounts from Part I, line 8 | | | | | | | | | | |
| 10 Allocation of current year U.S. source losses (see instructions) | | | | | | | | | | |
| 11 Numerator of Limitation Fraction —Subtract line 10 from line 9. Enter each result here and on Part II, line 6, of corresponding Schedule B. | | | | | | | | | | |

Part II Year-End Balances of Future Separate Limitation Income That Must Be Recharacterized

| | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|
| a General limitation income | | | | | | | | | | |
| b Passive income | | | | | | | | | | |
| c High withholding tax interest | | | | | | | | | | |
| d Financial services income | | | | | | | | | | |
| e Shipping income | | | | | | | | | | |
| f Dividends from a DISC or former DISC | | | | | | | | | | |
| g Taxable income attributable to foreign trade income | | | | | | | | | | |
| h Certain distributions from a FSC or former FSC | | | | | | | | | | |
| i Dividends from noncontrolled section 902 corporation* | | | | | | | | | | |
| j Other income* | | | | | | | | | | |

Part III Overall Foreign Loss Account Balances (section 904(f)(1))
Complete for each separate limitation income category

| | | | | | | | | | | |
|---|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 1 Beginning balance | | | | | | | | | | |
| 2 Current year additions | | | | | | | | | | |
| 3 Current year reductions (other than recapture) | () | () | () | () | () | () | () | () | () | () |
| 4 Subtotal —Combine lines 1 through 3 | | | | | | | | | | |
| 5 Current year recapture (from Part I, line 5) | | | | | | | | | | |
| 6 Ending balance—Subtract line 5 from line 4. | | | | | | | | | | |

* Important: See Computer-Generated Schedule J in instructions.

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Schedule

- Part I is used to show adjustments to separate limitation income or (losses) in determining the numerator of the limitation fraction for each separate credit limitation.

- Part II is used to show the year-end balances of future separate limitation income categories that must be recharacterized as income of other separate income categories (as the result of current year or prior year separate limitation losses that were allocated to those other separate limitation income categories).

- Part III is used to show: (1) the balances in the corporation's overall foreign loss accounts at the beginning of the tax year; (2) any adjustments; and (3) the balances in the overall foreign loss accounts at the end of the tax year.

Important: Complete Schedule J only once. Include adjustments for each applicable separate limitation income category.

Computer-Generated Schedule J

A computer-generated Schedule J can be filed if it conforms to the IRS version of the schedule. Expand Schedule J to properly allocate the separate limitation losses among the categories with positive taxable income if the corporation owns an interest in more than one noncontrolled section 902 corporation.

Also expand Schedule J if the corporation had other income as follows:

- Income from more than one section 901(j) country; or
- U.S. source income that it elected under a treaty to treat as foreign source.

Dividends received from each noncontrolled section 902 corporation, income from each sanctioned country described in section 901(j), and each item of income resourced under a treaty are treated as a separate category of income.

Specific Instructions

Part I

Note: See Notice 89-3, 1989-1 C.B. 623, and Regulations section 1.904(f)-12 for more information on the ordering of adjustments to each separate limitation income or (loss) category to get the numerator of the limitation fraction for each separate limitation income category.

Line 1. Enter in each applicable column the income or (loss) from column 12 of the corresponding Schedule A for that separate limitation category of income.

Important. Be sure to consider on this line the possible interplay between the

separate limitation losses and any net operating losses or net capital losses of which they may be a part.

Line 2. This allocation grid must be completed to show the pro rata share of each separate limitation loss to be allocated among other applicable categories of income.

To determine each pro rata share:

- Add all of the separate limitation loss amounts entered across line 1. Then add all of the income amounts entered across line 1.
- If the combined separate limitation losses for the tax year **do not exceed** the combined separate limitation income for the tax year, the pro rata share of each separate limitation loss to allocate to each category with positive taxable income is as follows:

$$\frac{\text{Separate limitation income category}}{\text{Combined separate limitation income from all categories with positive taxable income}} \times \text{Separate limitation loss being allocated}$$

- If the combined separate limitation losses for the tax year **exceed** the combined separate limitation income for the tax year, the pro rata share of each separate limitation loss to allocate to each category having income is as follows:

$$\frac{\text{Separate limitation loss being allocated}}{\text{Combined separate limitation losses from all categories with taxable losses}} \times \text{Separate limitation income in a given category}$$

- If separate limitation losses can be allocated, enter the total amounts allocated in the bold-outlined boxes as positive numbers. Enter each separate amount allocated to a given category across the same line under the appropriate column heading to which it was allocated.

Note: The numbers entered across any given line should "zero out."

The combined separate limitation losses for the tax year that are more than the combined separate limitation income for the tax year reduce the U.S. source income (if any) for the tax year. If the corporation has no U.S. source income for the tax year, or if the excess of its combined separate limitation losses for the tax year over combined separate limitation income for the tax year exceeds its U.S. source income for the tax year, the excess is treated as a net operating loss. This loss may be carried over or back to other tax years according to the rules of section 172.

Example 1. Corporation X has income of \$4,000 in its general limitation income category (line 1, column (i)) and income of \$1,000 in its financial services income category (line 1, column (iv)). In addition, the corporation has a separate limitation loss of \$2,000 in its shipping income category (line 1, column (v)).

Since the corporation's combined separate limitation losses for the tax year (\$2,000) **do not exceed** its combined separate limitation income for the tax year (\$5,000), the entire \$2,000 may be allocated to other separate limitation income categories. Therefore, Corporation X enters a positive \$2,000 in the bold-outlined box on line 2e, column (v).

To compute the portion of the \$2,000 separate limitation loss that is allocable to general limitation income, Corporation X divides the \$4,000 of separate limitation income by \$5,000 (the combined separate limitation income from all categories with positive taxable income). The result of 80% is multiplied by the separate limitation loss of \$2,000. Corporation X enters the product of \$1,600 on line 2e, column (i).

To compute the portion of the \$2,000 separate limitation loss that is allocable to financial services income, Corporation X divides the \$1,000 of separate limitation income by \$5,000. The result of 20% is multiplied by the separate limitation loss of \$2,000. Corporation X enters the product of \$400 on line 2e, column (iv).

Corporation X enters \$2,400 (\$4,000 minus \$1,600) on line 3, column (i); \$600 (\$1,000 minus \$400) on line 3, column (iv); and \$0 (negative \$2,000 plus positive \$2,000) on line 3, column (v).

Line 4. Enter the overall foreign losses for the tax year (from line 3) if they have reduced U.S. source income for the tax year.

Important. If an overall foreign loss has reduced U.S. source income, do not complete the remainder of Part I for that separate limitation income category. However, complete Parts II and III for that category to show the year-end balance in the separate limitation loss and overall foreign loss accounts.

Line 5. Recapture overall foreign losses that reduced U.S. source income in prior tax years (section 904(f)(1)). To do this, treat a portion of the current year separate limitation income that is of the same category as the loss that resulted in the prior year overall foreign loss as U.S. source income. Recapture continues until the applicable overall foreign loss account balance (Part III) is reduced to zero.

The amount of any current year separate limitation income subject to recapture is the smaller of the balance in the applicable overall foreign loss account (the applicable line 1 amount of Part III), or 50% of all amounts entered on line 3, Part I.

The corporation can make an annual, revocable election to recapture a greater portion of the balance in an overall foreign loss account by attaching a statement to Form 1118 indicating:

1. The percentage and dollar amount of the separate limitation income category that is treated as U.S. source income, and

2. The percentage and dollar amount of the balance (both before and after recapture) in the overall foreign loss account that is recaptured.

Line 7. If a separate limitation loss was allocated in a prior tax year, and the corporation has income during the current tax year in the separate limitation income category from which the loss was allocated, that current year income (if it was not previously recharacterized) must be recharacterized as income of the separate limitation income categories to which the loss was allocated in the prior year(s) (section 904(f)(5)).

If a prior year separate limitation loss was allocated to more than one separate limitation income category **and** there is not enough current year income in the separate limitation category from which the loss was allocated to recharacterize all remaining balances, then the current year income must be recharacterized as income of the other separate limitation categories on a pro rata basis in the following manner:

$$\begin{array}{l} \text{Current year income in separate limitation} \\ \text{category from which losses were} \\ \text{previously allocated} \end{array} \times \frac{\begin{array}{l} \text{Amount remaining to} \\ \text{be recharacterized} \\ \text{as income of a given} \\ \text{separate limitation} \\ \text{category} \end{array}}{\begin{array}{l} \text{Amounts remaining to} \\ \text{be recharacterized as} \\ \text{income of all separate} \\ \text{limitation categories} \end{array}}$$

Any amount that is not recharacterized during the tax year (i.e., the excess of separate limitation losses previously allocated over current year income in that same separate limitation category) must be entered into the grid at Part II.

Note: *Recharacterization of separate limitation income does not result in recharacterizing any tax. The rules of Regulations section 1.904-6 apply on an annual basis for allocating taxes to separate limitation income categories.*

If prior year separate limitation losses can be recharacterized, the total amounts recharacterized should be entered into the bold-outlined boxes as negative numbers. Each prior-year separate limitation loss recharacterized should be entered as a positive number on the same line under the appropriate column heading to which it was recharacterized.

Note: *The numbers entered across any given line should "zero out."*

Example 2. Assume the same facts in Example 1 on page 3. Also assume that,

in a subsequent tax year, Corporation X has \$1,500 of income in its shipping income category (on line 6, column (v), of its Schedule J).

Since there is not enough under shipping income to recharacterize the entire \$2,000 prior-year balance remaining to be recharacterized, Corporation X will prorate the \$1,500 of income in that subsequent year as follows:

- To compute the portion to be recharacterized as general limitation income, Corporation X should:
 1. Divide the \$1,600 remaining to be recharacterized from shipping income to general limitation income by the \$2,000 remaining to be recharacterized from shipping income to all separate limitation income categories.

2. Multiply the result (80%) by the \$1,500 of shipping income.

3. Enter \$1,200 as a positive number on line 7e, column (i).

- To compute the portion to be recharacterized as financial services income, Corporation X should:

1. Divide the \$400 remaining to be recharacterized from shipping income to financial services income by \$2,000.

2. Multiply the result (20%) by the \$1,500 of shipping income.

3. Enter \$300 as a positive number on line 7e, column (iv).

Corporation X enters the \$1,500 of shipping income that was recharacterized in the bold-outlined box at line 7e, column (v). Note that the total amounts entered across line 7e now equal zero.

Finally, Corporation X completes the Part II recharacterization balances grid by entering \$400 (\$1,600 minus \$1,200) on line e, column (i), and \$100 (\$400 minus \$300) on line e, column (iv).

Line 10. Enter the U.S. source losses allocated to the separate limitation income category during the tax year. Use the following formula:

$$\text{U.S. source loss} \times \frac{\text{Income in the separate limitation category}}{\text{Combined separate limitation income categories}}$$

U.S. source losses that are part of a net operating or net capital loss that are carried back or forward to another tax year (section 172 or Regulations sections 1.1502-21(b) and 1.1502-79(a)) are allocated first to U.S. source income for the tax year to which the losses are carried, and then to the separate limitation income category for the

current tax year according to the rules set forth above.

U.S. source losses in excess of the separate limitation losses for a tax year must be treated as net operating losses that may be carried back or forward to other tax years using the rules of section 172.

Part II

If a separate limitation loss was allocated in a prior tax year and the corporation has income during the current tax year in the separate limitation income category from which the loss was allocated, that current year income (if it was not previously recharacterized) must be recharacterized as income of the category to which the loss was allocated in the prior year(s) (section 904(f)(5)).

To determine the amounts to enter into the grid:

1. Add the current year separate limitation loss allocations (subject to Regulations section 1.904(f)-1(d) capital gains adjustments) to last year's year-end balances.

2. Subtract the amounts recharacterized during the current tax year.

3. Enter the result on the line (line a-j) for the separate limitation income category from which losses were previously allocated, under the appropriate column (column (i)-(x)) to which the losses were previously allocated.

Example 3. Assume the same facts in Example 1 on page 3. Also assume that Corporation X does not have any remaining balances from any prior allocations of losses from its shipping income category to its general limitation income or its financial services income. The corporation should enter \$1,600 on line e, column (i), and \$400 on line e, column (iv).

Part III

Line 1. Enter the ending balances from last year's schedule.

Lines 2, 3, and 5. Show any adjustments made to the overall foreign loss accounts for each separate limitation income category during the tax year. See Regulations section 1.904f-(d) for a list of possible additions to the accounts. See Regulations section 1.904(f)-1(e) for a list of possible reductions (including recapture).

Line 6. Enter the year-end balances of the overall foreign loss accounts for each separate limitation income category.

