

**Schedule A
(Form 8804)**

Department of the Treasury
Internal Revenue Service
Name

**Penalty for Underpayment of Estimated
Section 1446 Tax by Partnerships**

▶ Attach to Form 8804.
▶ See separate instructions.

OMB No. 1545-1119

2009

Employer identification number

Note. Generally, the partnership is not required to file this Schedule A (see Part I below for exceptions) because the IRS will figure any penalty owed and bill the partnership. However, the partnership may still use this Schedule A to figure the penalty. If so, enter the amount from line 65 of this Schedule A on line 8 of Form 8804, but **do not attach this Schedule A**.

Part I Reasons for Filing—Check the boxes below that apply. If any boxes are checked, the partnership **must** file Schedule A (Form 8804) even if it does not owe a penalty (see instructions).

- The partnership is using the adjusted seasonal installment method.
- The partnership is using the annualized income installment method.

Part II Current Year and Prior Year Safe Harbors

1 Enter the total section 1446 tax shown on the partnership's 2009 Form 8804, line 5e. If less than \$500, do not complete or file this form. The partnership does not owe the penalty	1	
2 Enter the total section 1446 tax that would have been due for 2008, without regard to reductions for certified foreign partner-level items, on the effectively connected taxable income (ECTI) allocable to foreign partners for 2008. <i>Caution: This line 2 amount only applies if certain conditions are met (see instructions)</i>	2	
3 Enter the smaller of line 1 or line 2. If the partnership is required to skip line 2, enter the amount from line 1	3	

Part III Figuring the Underpayment

	(a)	(b)	(c)	(d)
4 Installment due dates. Enter in columns (a) through (d) the 15th day of the 4th, 6th, 9th, and 12th months of the partnership's tax year				
5 Required installments. If the partnership uses the adjusted seasonal installment method and/or the annualized income installment method, enter the amounts from line 43. If neither of those methods is used, enter 25% of line 3 above in each column				
6 Estimated section 1446 tax paid or credited for each period (see instructions). For column (a) only, enter the amount from line 6 on line 10				
Complete lines 7 through 13 of one column before going to the next column.				
7 Enter amount, if any, from line 13 of the preceding column				
8 Add lines 6 and 7				
9 Add amounts on lines 11 and 12 of the preceding column				
10 Subtract line 9 from line 8. If zero or less, enter -0-				
11 If the amount on line 10 is zero, subtract line 8 from line 9. Otherwise, enter -0-				
12 Underpayment. If line 10 is less than or equal to line 5, subtract line 10 from line 5. Then go to line 7 of the next column. Otherwise, go to line 13				
13 Overpayment. If line 5 is less than line 10, subtract line 5 from line 10. Then go to line 7 of the next column				

Go to Part VII on page 5 to figure the penalty. Do not go to Part VII if there are no entries on line 12—no penalty is owed.

Part IV **Adjusted Seasonal Installment Method** (Caution: Use this method only if the base period percentage for any 6 consecutive months is at least 70%. See instructions.)

		(a)	(b)	(c)	(d)
Check this box if the partnership has elected to attach a schedule that expands lines 15 and 22 through 25 to reflect Regulations section 1.1446-3(a)(2) (see instructions) <input type="checkbox"/>		First 3 months	First 5 months	First 8 months	First 11 months
14	Enter effectively connected taxable income allocable to all foreign partners for the following periods:				
a	Tax year beginning in 2006				
b	Tax year beginning in 2007				
c	Tax year beginning in 2008				
15	Enter effectively connected taxable income allocable to all foreign partners for each period for the tax year beginning in 2009 (see instructions for the treatment of extraordinary items).				
16	Enter effectively connected taxable income allocable to all foreign partners for the following periods:	First 4 months	First 6 months	First 9 months	Entire year
a	Tax year beginning in 2006				
b	Tax year beginning in 2007				
c	Tax year beginning in 2008				
17	Divide the amount in each column on line 14a by the amount in column (d) on line 16a.				
18	Divide the amount in each column on line 14b by the amount in column (d) on line 16b.				
19	Divide the amount in each column on line 14c by the amount in column (d) on line 16c.				
20	Add lines 17 through 19.				
21	Divide line 20 by 3.0.				
22a	Divide line 15 by line 21.				
b	Extraordinary items (see instructions).				
c	Combine lines 22a and 22b.				
23	Reduction to line 22c amount for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) and for certified foreign partner-level items submitted using Form 8804-C (see instructions).				
24	Subtract line 23 from line 22c. If zero or less, enter -0-.				
25	Multiply line 24 by 35%.				
26a	Divide the amount in columns (a) through (c) on line 16a by the amount in column (d) on line 16a.				
b	Divide the amount in columns (a) through (c) on line 16b by the amount in column (d) on line 16b.				
c	Divide the amount in columns (a) through (c) on line 16c by the amount in column (d) on line 16c.				
27	Add lines 26a through 26c.				
28	Divide line 27 by 3.0.				
29	Multiply the amount in columns (a) through (c) of line 25 by columns (a) through (c) of line 28. In column (d), enter the amount from line 25, column (d).				

Part V Annualized Income Installment Method

		(a)	(b)	(c)	(d)
		First _____ months	First _____ months	First _____ months	First _____ months
30	Annualization periods (see instructions).	30			
31	Enter effectively connected taxable income allocable to all foreign partners for each annualization period (see instructions for the treatment of extraordinary items):				
a	Net ordinary income and net short-term capital gain	31a			
b	28% rate gain (non-corporate partners only).	31b			
c	Unrecaptured section 1250 gain (non-corporate partners only).	31c			
d	Qualified dividend income and net long-term capital gain (including net section 1231 gains) (non-corporate partners only).	31d			
32	Annualization amounts (see instructions).	32			
33	Annualized effectively connected taxable income allocable to all foreign partners (see instructions for the treatment of extraordinary items):				
a	Net ordinary income and net short-term capital gain (multiply line 31a by line 32).	33a			
b	Reduction to line 33a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) (see instructions).	33b	()	()	()
c	Reduction to line 33a for certified foreign partner-level items submitted using Form 8804-C (see instructions).	33c	()	()	()
d	Combine lines 33a, 33b, and 33c.	33d			
e	28% rate gain allocable to non-corporate partners (multiply line 31b by line 32).	33e			
f	Reduction to line 33e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) (see instructions).	33f	()	()	()
g	Reduction to line 33e for certified foreign partner-level items submitted using Form 8804-C (see instructions).	33g	()	()	()
h	Combine lines 33e, 33f, and 33g.	33h			
i	Unrecaptured section 1250 gain allocable to non-corporate partners (multiply line 31c by line 32).	33i			
j	Reduction to line 33i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) (see instructions).	33j	()	()	()
k	Reduction to line 33i for certified foreign partner-level items submitted using Form 8804-C (see instructions).	33k	()	()	()
l	Combine lines 33i, 33j, and 33k.	33l			
m	Qualified dividend income and net long-term capital gain (including net section 1231 gains) allocable to non-corporate partners (multiply line 31d by line 32).	33m			
n	Reduction to line 33m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) (see instructions).	33n	()	()	()
o	Reduction to line 33m for certified foreign partner-level items submitted using Form 8804-C (see instructions).	33o	()	()	()
p	Combine lines 33m, 33n, and 33o.	33p			
34	Figure the tax on line 33 amounts as follows:				
a	Multiply line 33d by 35%.	34a			
b	Multiply line 33h by 28%.	34b			
c	Multiply line 33l by 25%.	34c			
d	Multiply line 33p by 15%.	34d			
e	Add lines 34a through 34d.	34e			
35	Applicable percentage.	35	25%	50%	75%
36	Multiply line 34e by line 35.	36			

Part VI Required Installments

Note. Complete lines 37 through 43 of one column before completing the next column.

		1st installment	2nd installment	3rd installment	4th installment
37	If only Part IV or Part V is completed, enter the amount in each column from line 29 or line 36. If both parts are completed, enter the smaller of the amounts in each column from line 29 or line 36.				
38	Add the amounts in all preceding columns of line 43 (see instructions).				
39	Adjusted seasonal or annualized income installments. Subtract line 38 from line 37. If zero or less, enter -0-.				
40	Enter 25% of line 1 in each column.				
41	Subtract line 43 of the preceding column from line 42 of the preceding column.				
42	Add lines 40 and 41.				
43	Required installments. Enter the smaller of line 39 or line 42 here and on line 5 (see instructions).				

Part VII Figuring the Penalty

	(a)	(b)	(c)	(d)
44 Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier (see instructions). <i>Partnerships that keep their records and books of account outside the United States and Puerto Rico:</i> Use 6th month instead of 4th month.				
45 Number of days from due date of installment on line 4 to the date shown on line 44				
46 Number of days on line 45 after 4/15/2009 and before 7/1/2009				
47 Underpayment on line 12 × $\frac{\text{Number of days on line 46}}{365} \times 4\%$	\$	\$	\$	\$
48 Number of days on line 45 after 6/30/2009 and before 10/1/2009				
49 Underpayment on line 12 × $\frac{\text{Number of days on line 48}}{365} \times 4\%$	\$	\$	\$	\$
50 Number of days on line 45 after 9/30/2009 and before 1/1/2010				
51 Underpayment on line 12 × $\frac{\text{Number of days on line 50}}{365} \times 4\%$	\$	\$	\$	\$
52 Number of days on line 45 after 12/31/2009 and before 4/1/2010				
53 Underpayment on line 12 × $\frac{\text{Number of days on line 52}}{365} \times 4\%$	\$	\$	\$	\$
54 Number of days on line 45 after 3/31/2010 and before 7/1/2010				
55 Underpayment on line 12 × $\frac{\text{Number of days on line 54}}{365} \times \%$	\$	\$	\$	\$
56 Number of days on line 45 after 6/30/2010 and before 10/1/2010				
57 Underpayment on line 12 × $\frac{\text{Number of days on line 56}}{365} \times \%$	\$	\$	\$	\$
58 Number of days on line 45 after 9/30/2010 and before 1/1/2011				
59 Underpayment on line 12 × $\frac{\text{Number of days on line 58}}{365} \times \%$	\$	\$	\$	\$
60 Number of days on line 45 after 12/31/2010 and before 4/1/2011				
61 Underpayment on line 12 × $\frac{\text{Number of days on line 60}}{365} \times \%$	\$	\$	\$	\$
62 Number of days on line 45 after 3/31/2011 and before 5/16/2011				
63 Underpayment on line 12 × $\frac{\text{Number of days on line 62}}{365} \times \%$	\$	\$	\$	\$
64 Add lines 47, 49, 51, 53, 55, 57, 59, 61, and 63	\$	\$	\$	\$
65 Penalty. Add columns (a) through (d) of line 64. Enter the total here and on Form 8804, line 8			65 \$	

***For underpayments paid after March 31, 2010:** For lines 55, 57, 59, 61, and 63, use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at www.irs.gov. You can also call 1-800-829-1040 to get interest rate information.