



Figure 7. Decision tree for allocation of expenses and income.*

* The Section 163(j) limitation takes into account only items of income, gain, expense, or deduction (including interest) allocable to a "non-excepted" T/B. Electing real property T/Bs, electing farm T/Bs, certain regulated utilities, and performing services as an employee are excepted from Section 163(j).¹⁷

** A consolidated group is treated as a single corporation. First determine the percentage of the group's interest expense allocable to excepted T/Bs, then apply proportionally to each member that has paid interest to a third party during the year.

*** Average the adjusted basis of assets on a quarterly basis to calculate the relative amounts of adjusted basis allocable to excepted and non-excepted T/Bs for a tax year. Use the most reasonable of the various identified methodologies for allocating adjusted basis in an asset used in more than one T/B. A partner with at least eighty percent of a partnership's capital or profits may look through to its share of the adjusted basis in the partnership's assets to determine how to allocate its adjusted basis in its partnership interest to excepted or non-excepted T/Bs (taking into account any Section 754(b) and 754(b) adjustments).

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TD Snyder

A red circular graphic with a gradient, appearing as a semi-circle or a partial circle, located to the right of the TD Snyder text.

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