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## TREASURY/IRS AND OMB USE ONLY DRAFT

(Rev. December 2025) Department of the Treasury

## Section 250 Deduction for Foreign-Derived Intangible Income (FDII) and Global Intangible Low-Taxed Income (GILTI)

OMB No. 1545-0123

Internal Revenue Service Name of person filing this return Go to www.irs.gov/Form8993 for instructions and the latest information.

Attachment Sequence No. **993** 

Name of	ne of person filing this return							ntifying number	
Part	Determining Deduction Eligible Incom	n	e (DFI) and Dee	med Intan	aible	Income (DI	II) (se	e ins	structions)
1	Gross income				9.0.0		.	1	, ii dollorioj
2	Exclusions:	•						-	
a	Income included under section 951(a)(1) (see instructions)								
b	Income included under section 951A (see instructions)				2a 2b		$\neg$		
С	Financial services income				2c				
d	CFC dividends (see instructions)								
е	Domestic oil and gas extraction income								
f	Foreign branch income				2f				
g	Income and gain from the sale or other disposition of intangible property under section 250(b)(3)(A)(i)(VII)(aa) (see instructions) 2g								
h	Income and gain from the sale or other disposition of certain other property under section 250(b)(3)(A)(i)(VII)(bb) (see instructions)								
3	Total exclusions (add lines 2a through 2h)							3	
4	Gross DEI (subtract line 3 from line 1)							4	
5	Deductions properly allocable to the amount on line 4							5	
6	DEI (subtract line 5 from line 4)						. [	6	
7a	Deemed tangible income return (DTIR) (10% of QI				7a				
b	DTIR (10% of QBAI) from partnerships				7b				
С	Total DTIR (add lines 7a and 7b)							7c	
8	DII (subtract line 7c from line 6)							8	
Part II Determining Foreign-Derived Deduction Eligible Income (FDDEI) (see instructions)									
				(B) Foreign-de income from al of intangible pr	l sales	(C) Foreign-der income from services			(D) Total (add columns (A) through (C))
9a	Gross receipts	Ī						9a	
b	Gross receipts from partnerships	Ī						9b	
С	Total gross receipts (add lines 9a and 9b)	Ī						9с	
10a	Cost of goods sold (COGS) (see instructions) .	Ī						10a	
b	COGS from partnerships (see instructions)	Ī						10b	
С	Total COGS (add lines 10a and 10b)							10c	
11	Gross FDDEI (subtract line 10c from line 9c) .	Ī						11	
12	Allocable deductions							12	
13	Allocable deductions from partnerships							13	
14	Interest deductions							14	
15	Research and experimental deductions							15	
16	Other apportioned deductions							16	
17	Other apportioned deductions from partnerships						-	17	
18	Total deductions (add lines 12 through 17)							18	
19	FDDEI (subtract line 18 from line 11)							19	
Part III Determining FDII and/or GILTI Deduction (see instructions)									
20	Foreign-derived ratio (FDDEI/DEI) (divide line 19 b							20	
21	FDII (multiply line 8 by line 20)							21	
22	GILTI inclusion (see instructions)							22	
23	Total FDII and GILTI (add lines 21 and 22)							23	
24	and 29.)							24	
25	Excess FDII and GILTI over taxable income (subtract line 24 from line 23). If zero or less, enter -0-								
	here and on lines 26 and 27						-	25	
26	FDII reduction (divide line 21 by line 23; multiply b	-	·				-	26	
27	GILTI reduction (subtract line 26 from line 25) .							27	
28	FDII deduction (see instructions). Enter here and on Form 1120, Schedule C						-	28	
29	GILTI deduction (see instructions). Enter here and on Form 1120, Schedule C								