Penalty for Underpayment of Estimated Section 1446 Tax by Partnerships

OMB No. 1545-1119

2

Attach to Form 8804.

Department of the Treasury Internal Revenue Service Name

► For information about Schedule A (Form 8804) and its instructions, go to www.irs.gov/uac/About-Schedule-A-Form-8804.	
Employer identifica	tion 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	Reasons for Filing – Check the boxes below the Schedule A (Form 8804) even if it does not own				d, the	partner	ship must file		
	 The partnership is using the adjusted seasonal installmer The partnership is using the annualized income installme 								
Part	I Current Year and Prior Year Safe Harbors								
1	Enter the total section 1446 tax shown on the partnership's 2013 Form 8804, line 5f. If less than \$500, do not complete or file this form. The partnership does not owe the penalty								
2	Enter the total section 1446 tax that would have been due for 2012, without regard to reductions for certified foreign partner-level items, on the effectively connected taxable income (ECTI) allocable to foreign partners for 2012.								
3	Caution: <i>This line 2 amount only applies if certain conditions</i> Enter the smaller of line 1 or line 2. If the partnership is re- line 1	equire	d to skip line 2,	enter the amount	t from	2			
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	4							
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	5							
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	6							
	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	7							
8	Add lines 6 and 7	8							
9	Add amounts on lines 11 and 12 of the preceding column	9							
10	Subtract line 9 from line 8. If zero or less, enter -0	10							
11	If the amount on line 10 is zero, subtract line 8 from line 9. Otherwise, enter -0	11							
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	12							
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	13	4 V/II : 6 41		- 10				
	Go to Part VII on page 5 to figure the penalty. Do not go t	o Par	t vii it there are	no entries on lin	e 12—n	o penal	ty is owea.		

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 40853F

Schedu Part				nly if the base	period perce	Page 2 entage for
	any 6 consecutive months is at least 70%. See instruc	ctions	· · · · · · · · · · · · · · · · · · ·	(b)	(a)	(4)
that e	this box if the partnership has elected to attach a schedule xpands lines 15 and 22 through 25 to reflect Regulations n 1.1446-3(a)(2) (see instructions)		(a) First 3 months	(b) First 5 months	(c) First 8 months	(d) First 11 months
а	Tax year beginning in 2010	14a				
b	Tax year beginning in 2011	14b				
с	Tax year beginning in 2012	14c				
15	Enter ECTI allocable to all foreign partners for each period for the tax year beginning in 2013 (see instructions for the treatment of extraordinary items).	15				
16	Enter ECTI 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 2010	16a				
b	Tax year beginning in 2011	16b				
с	Tax year beginning in 2012	16c				
17	Divide the amount in each column on line 14a by the amount in column (d) on line 16a.	17				
18	Divide the amount in each column on line 14b by the amount in column (d) on line 16b.	18				
19	Divide the amount in each column on line 14c by the amount in column (d) on line 16c.	19				
20	Add lines 17 through 19.	20				
21	Divide line 20 by 3.0.	21				
22a	Divide line 15 by line 21.	22a				
b	Extraordinary items (see instructions).	22b				
c	Combine lines 22a and 22b.	22c				
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).	23				
24	Subtract line 23 from line 22c. If zero or less, enter -0	24				
25	Multiply the ECTI on line 24 allocable to non-corporate partners by 39.6%. Multiply the ECTI on line 24 allocable to corporate partners by 35%. Then combine the two amounts.	25				
26a	Divide the amount in columns (a) through (c) on line 16a by the amount in column (d) on line 16a.	26a				
b	Divide the amount in columns (a) through (c) on line 16b by the amount in column (d) on line 16b.	26b				
С	Divide the amount in columns (a) through (c) on line 16c by the amount in column (d) on line 16c.	26c				
27	Add lines 26a through 26c.	27				
28	Divide line 27 by 3.0.	28				
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).	29				

Schedule A (Form 8804) 2013

Part V Annualized Income Installment Method

Part	Annualized Income Installment Method		(a)	(b)	(c)	(d)
			First	First	First	First
30	Annualization periods (see instructions).	30	months	months	months	months
31	Enter ECTI allocable to all foreign partners for each annualization period (see instructions for the treatment of extraordinary items):					
a	Total ECTI allocable to corporate partners.	31a				
b	Total ECTI allocable to non-corporate partners other than on lines 31c, 31d, and 31e.	31b				
<u> </u>	28% rate gain (non-corporate partners only).	31c				
d	Unrecaptured section 1250 gain (non-corporate partners only).	31d				
e	Adjusted net capital gain (including qualified dividend income and net section 1231 gains) (non-corporate partners only).	31e				
32	Annualization amounts (see instructions).	32				
33	Annualized ECTI allocable to all foreign partners (see instructions for the treatment of extraordinary items):					
a	Total ECTI allocable to corporate partners (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	()	() (()
С	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				
е	Total ECTI allocable to non-corporate partners other than on lines 33i, 33m, and 33q (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)	33f				
g	Reduction to line 33e for certified foreign partner-level items submitted using Form 8804-C.	33g				
h	Combine lines 33e, 33f, and 33g.	33h				
i 	28% rate 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	()	()	()
I	Combine lines 33i, 33j, and 33k.	331				
m	Unrecaptured section 1250 gain 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	()	() (()
0	Reduction to line 33m for certified foreign partner-level items submitted using Form 8804-C (see instructions).	330	()	() (()
р	Combine lines 33m, 33n, and 33o.	33p				
q	Adjusted net capital gain (including qualified dividend income and net section 1231 gains) allocable to non-corporate partners (multiply line 31e by line 32).	33q				
r	Reduction to line 33q for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) (see instructions).	33r	()	(()
S	Reduction to line 33q for certified foreign partner-level items submitted using Form 8804-C (see instructions).	33s	()	(
t	Combine lines 33q, 33r, and 33s.	33t	,		1	,
34	Figure the tax on line 33 amounts as follows:					
а	Multiply line 33d by 35%.	34a				
b	Multiply line 33h by 39.6%.	34b				
C	Multiply line 33l by 28%.	34c				
	Multiply line 33p by 25%.	34d				
e	Multiply line 33t by 20%. Add lines 34a through 34e.	34e 34f				
f	Auu intes 34a lintough 348.	341				

Schedule A (Form 8804) 2013

preceding column.

42

43

Add lines 40 and 41.

and on line 5 (see instructions).

Required installments. Enter the smaller of line 39 or line 42 here

Schedi	Jie A (Form 8804) 2013					Page
Par	V Annualized Income Installment Method					
			(a)	(b)	(c)	(d)
35	Applicable percentage.	35				
36	Multiply line 34f by line 35.	36				
Part	VI Required Installments					
	Complete lines 37 through 43 of one column before completing ext 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.	37				
38	Add the amounts in all preceding columns of line 43 (see instructions).	38				
39	Adjusted seasonal or annualized income installments. Subtract line 38 from line 37. If zero or less, enter -0	39				
40	Enter 25% of line 1 in each column.	40				
41	Subtract line 43 of the preceding column from line 42 of the					

41

42

43

Schedule A (Form 8804) 2013

Pa	rt VII Figuring the Penalty					
44	Enter the date of payment or the 15th day of the 4th month		(a)	(b)	(c)	(d)
	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</i>					
	<i>Rico:</i> Use 6th month instead of 4th month.					
		44				
45	Number of days from due date of installment on line 4 to the					
	date shown on line 44	45				
40		40				
46	Number of days on line 45 after 4/15/2013 and before 7/1/2013	46				
47	Underpayment on line 12 \times Number of days on line 46 \times 3% .	47	\$	\$	\$	\$
47		4/	Ψ	Ψ	Ŷ	Ψ
48	Number of days on line 45 after 6/30/2013 and before 10/1/2013 .	48				
-10						
49	Underpayment on line 12 \times Number of days on line 48 \times 3% .	49	\$	\$	\$	\$
	365					
50	Number of days on line 45 after 9/30/2013 and before 1/1/2014 .	50				
51	Underpayment on line 12 × Number of days on line 50 × 3% .	51	\$	\$	\$	\$
	365					
52	Number of days on line 45 after 12/31/2013 and before 4/1/2014 $\ .$	52				
53	Underpayment on line 12 \times Number of days on line 52 \times 3% .	53	\$	\$	\$	\$
	365					
54	Number of days on line 45 after 3/31/2014 and before 7/1/2014	54				
			¢	¢		¢
55	Underpayment on line 12 \times Number of days on line 54 \times *%	55	\$	\$	\$	\$
50		50				
56	Number of days on line 45 after 6/30/2014 and before 10/1/2014	56				
57	Underpayment on line 12 \times Number of days on line 56 \times *% .	57	\$	\$	\$	\$
57		57	Ψ	Ψ	Ψ	Ψ
58	Number of days on line 45 after 9/30/2014 and before 1/1/2015 .	58				
50						
59	Underpayment on line 12 \times Number of days on line 58 \times *%	59	\$	\$	\$	\$
	365					
60	Number of days on line 45 after 12/31/2014 and before 4/1/2015 .	60				
61	Underpayment on line 12 × Number of days on line 60 × *% .	61	\$	\$	\$	\$
	365					
62	Number of days on line 45 after 3/31/2015 and before 5/16/2015 $\ .$ $\ .$	62				
63	Underpayment on line 12 × Number of days on line 62 × *%	63	\$	\$	\$	\$
	365					
	Add lines 47, 49, 51, 53, 55, 57, 59, 61, and 63	64	\$	\$	\$	\$
65	Penalty. Add columns (a) through (d) of line 64. Enter the total here line 8				¢	
+ + + +	the penalty interest rate for each calendar quarter, which the l				\$	

* 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.