

# SCHEDULE C-7 CREDIT FOR TAX PAID BY AFFILIATED ENTITIES

Corporation Name

FEIN		Tax Year Beginning		Tax Year Ending	
SECTI	ON I STATE INCOME TAX LIABILITY FOR A	AFFILIATED ENTITIES			
1. Affili	ated Entity Name	FEIN	Jurisd	iction	Credit Code
a.	Imposed State Tax	1a.			
	State (or Jurisdiction) Income Tax Credits	1b.		_	
	Adjusted Tax	10.		1c.	
		44		16.	
d.		1d.			
e.		1e.			
f.	Liability Due			1f.	
- 4.55111			1		
2. Affiliated Entity Name		FEIN	Jurisd	iction	Credit Code
a.	Imposed State Tax	2a.			
b.	State (or Jurisdiction) Income Tax Credits	2b.			
C.	Adjusted Tax			2c.	
d.	Total Intangible Expenses & Related Interest	2d.			
e.	Total Income	2e.		_	
f.	Liability Due			2f.	
		,		_	
3. Affiliated Entity Name		FEIN	Jurisdiction		Credit Code
a.	Imposed State Tax	3a.			
b.	State (or Jurisdiction) Income Tax Credits	3b.	3b.		
C.	Adjusted Tax			3c.	
d.	Total Intangible Expenses & Related Interest	3d.			
е.	Total Income	3e.			
f.	Liability Due			3f.	



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Affiliated Entity Name		FEIN Jurisdi		ction	Credit Code
a.	Imposed State Tax	4a.			
b.	State (or Jurisdiction) Income Tax Credits	4b.		-	
C.	Adjusted Tax			4c.	
d.	Total Intangible Expenses & Related Interest	4d.			
e.	Total Income	4e.		-	
f.	Liability Due			4f.	
5. Affilia	ated Entity Name	FEIN	Jurisdie	ction	Credit Code
a.	Imposed State Tax	5a.			
b.	State (or Jurisdiction) Income Tax Credits	5b.		-	
C.	Adjusted Tax			5c.	
d.	Total Intangible Expenses & Related Interest	5d.			
e.	Total Income	5e.		-	
f.	Liability Due			5f.	
6. Tota	Il Liability Due			6.	
SECTION	ON II CREDITS ALLOWED & LIMITATIONS				
1. Total	I Liability Due from Section I.	1.			
2. Ente	er Apportionment Factor Percentage from RCT-101, Schedule C-1.	2.		-	
3. Multi	iply Line 1 by Line 2.			3.	
4. Ente	er Amount from Schedule C-6, Line 11.	4.			
5. Ente	er Apportionment Factor Percentage from RCT-101, Schedule C-1.	5.			
6. Multi	iply Line 4 by Line 5.			6.	
7. Ente	er PA Corporate Net Income Tax Rate.	7.			
8. Multi	iply Line 6 by Line 7.			8.	
9. Ente	er Smaller amount of Line 3 or Line 8.			9.	





REV-803 IN (SU) 06-24

# **Instructions for REV-803**

Credit For Tax Paid By Affiliated Entities

# **GENERAL INFORMATION**

#### **PURPOSE OF SCHEDULE**

The purpose of this credit is to ensure there is no double taxation and discrimination against interstate commerce in the addition of intangible expense or cost and interest expense or cost.

For taxable years beginning after December 31, 2014, taxpayers that are required to add back intangible expenses or cost and related interest expense or cost deductions to their federal taxable income may claim a credit for a portion of the tax paid by the affiliated entity if:

- 1. the affiliated entity was subject to tax within the Commonwealth of Pennsylvania or another state, and
- 2. the tax base includes the intangible expense or cost and interest expense or cost that was paid, accrued, or incurred by the taxpayer.

The portion of tax paid by the affiliated entity is computed by multiplying the apportionment factor of the taxpayer in Pennsylvania by the greater of:

- the tax liability of the affiliated entity with respect to the portion of its income representing the intangible expense or cost, or the interest expense or cost, paid, accrued, or incurred by the taxpayer; or
- 2. the aforementioned tax liability before it was offset by a credit given by Pennsylvania or that state, except credits made for prepayments of tax.

The resultant credit for tax paid by the affiliated entity shall not exceed the taxpayer's liability in this commonwealth attributable to the addition of intangible expense or cost and interest expense or cost to federal taxable income. (72 P.S. 7401(3) (1) (t))

# WHEN TO FILE

This schedule must be filed at the same time the corporation files its RCT-101, PA Corporate Net Income Tax Report.

## WHERE TO FILE

This schedule must be submitted with RCT-101 and with REV-802, Schedule C-6, Add-back for Intangible Expenses or Costs and Related Interest Expense.

# **COMPLETING PA SCHEDULE C-7**

#### **CORPORATION NAME**

Enter the complete name of the corporation as shown on the RCT-101, PA Corporate Net Income Tax Report.

# FEDERAL EMPLOYER IDENTIFICATION NUMBER

Enter the 9-digit FEIN of the corporation as shown on RCT-101.

#### TAX YEAR BEGINNING AND TAX YEAR ENDING

Enter the tax year beginning and tax year ending as shown on RCT-101.

#### LINE INSTRUCTIONS

#### **GENERAL INFORMATION:**

- Fill in form using all CAPS.
- Do not use dashes (-) or slashes (/) in any field.
- Enter dates as MMDDYYYY.
- Use ONLY whole dollars.

# **SECTION I**

# STATE INCOME TAX LIABILITY FOR AFFILIATED ENTITIES

This section allows for the listing of up to five income tax returns that the Affiliated Entity (or Entities) filed in jurisdictions that are non-unitary and that include in their tax base the intangible and related interest expense that was paid by the taxpayer as shown on REV-802, Schedule C-6 Add-back for Intangible Expenses or Cost and Related Interest. If the taxpayer availed itself to any of the three statutory exceptions on Schedule C-6, they cannot claim the credit on this schedule. If the number of affiliated entities and number of returns goes over the five lines shown in Section I, the taxpayer should photocopy Section I, using a separate copy for each affiliated entity so that the income tax paid to the qualifying jurisdictions will be separately shown on Lines 1 - 5.

#### **AFFILIATED ENTITY NAME**

List the name of the affiliated entity for which the credit is computed. List entities in the same order as provided on Section I of the REV-802, Schedule C-6 Add-back for Intangible Expenses or Costs and Related Interest Expense.

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#### FEDERAL EMPLOYER IDENTIFICATION NUMBER

List the FEIN of the affiliated entity for which the credit is computed.

#### **JURISDICTION**

Include only those states where the affiliated entity was required to file on a non-unitary basis. Do not include states where unitary returns, partial unitary returns, or elective unitary returns were filed inclusive of the affiliated entity. Also, include only those states where the affiliated entity was subject to a corporate tax on net income.

#### **CREDIT CODE**

Use the following codes to describe the type of add-back credit: 01=Research; 02=Community Development; 03=Investment; 04=Economic Revitalization; 05=Jobs Creation; 06=Film Production; 07=Environmental Protection; 08=Other.

# LINE a

For each affiliated entity, enter the amount of state income tax deducted for each non-unitary filing state, as computed and included in the total amount deducted for state income taxes reported under federal Form 1120, Line 17 – Taxes and Licenses, for that affiliated entity. This amount of corporate net income tax is only for the non-unitary filing state, not the total amount for all state income taxes paid on Line 17 for the affiliated return.

**Example:** Affiliated entity has a total state income tax expense of \$1,000,000 on Line 17 of its federal Form 1120. But of this \$1,000,000, only \$250,000 was for corporate net income tax incurred for three states that require the filing of non-unitary returns. The remainder of the \$1,000,000 deducted on Line 17 was either for taxes based on net worth or capital stock, or was allocations from states that require the filing of combined returns (unitary filings). Only the corporate net income taxes incurred for these three states, individually listed will be included on Line a.

#### LINE b

Enter the amount for any state tax credits other than for the payment of tax that were included in the amount shown on Line a.

# LINE c

Enter the amount of tax based on income and adjusted for credits by adding Line a and Line b.

## LINE d

Enter the total amount of intangible expense or cost and related interest expense or cost that the taxpayer paid to the affiliated entity. The transaction must be included in the tax base of the affiliated entity for that state.

# LINE e

Enter the total income received by affiliated entity as reported on Line 1C and Lines 4 through 10 on its proforma federal Form 1120 that was taxable as income for that state. To the extent any of these items of income are offset by an additional deduction to Line 28 in determining taxable income for that state, those items are not taxable income.

## LINE f

Compute the tax liability that the affiliated entity incurred for each state that was attributable to the intangible expenses and related interest expense or cost paid by the taxpayer to the affiliated entity, using the formula: c \* (d/e) = f. Divide Line d by Line e, then multiply the quotient by Line c.

# LINE 6

Enter the total liability due by adding Lines 1f – 5f.

#### **SECTION II**

CREDITS ALLOWED & LIMITATIONS
COMPUTING THE CREDITS ALLOWED

# LINE 1

Enter the total liability due from Section I, Line 6.

# LINE 2

Enter the apportionment proportion used for the corporate net income tax from RCT-101, Schedule C-1, Line 1C or Line 2C, whichever is applicable.

#### LINE 3

Multiply Line 1 by Line 2.

#### COMPUTING THE LIMITATIONS TO THE CREDIT

#### LINE 4

Enter the total add-back for the intangible expenses and related interest expense or cost from Schedule C-6, Section I, Line 11.

## LINE 5

Enter the apportionment proportion used for the corporate net income tax from RCT-101, Schedule C-1, Line 1C or Line 2C, whichever is applicable.

## LINE 6

Multiply Line 4 by Line 5.

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# LINE 7

Enter the PA corporate net income tax rate.

# LINE 8

Multiply Line 6 by Line 7.

# LINE 9

Enter the smaller of Line 3 or Line 8. Carry the amount to RCT-101, Section C, Line 15.

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