



July 31, 2017

Internal Revenue Service
CC:PA:LPD:PR (REG-136118-15)
Room 5207
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

Re: Request to Testify on [Proposed Regulations](#) Regarding the Centralized Partnership Audit Regime ([REG-136118-15](#), Docket ID [IRS-2017-0009](#))

Dear Sir or Madam:

The American Institute of CPAs (AICPA) requests to testify at the Department of the Treasury (“Treasury”) and the Internal Revenue Service (IRS or “Service”) public hearing on September 18, 2017, on the proposed regulations (REG-136118-15) regarding the centralized partnership audit regime.

Michael Greenwald, MPPM, CPA, who is a partner at Friedman LLP and currently serves as Chair of the AICPA Partnership Taxation Technical Resource Panel will testify on behalf of the AICPA.

We have attached an outline of the topics that Mr. Greenwald plans to cover on REG-136118-15. The AICPA will submit to Treasury and the IRS the full text of our comments prior to the hearing date.

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The AICPA is the world’s largest member association representing the accounting profession, with more than 418,000 members in 143 countries and a history of serving the public interest since 1887. Our members advise clients on federal, state and international tax matters and prepare income and other tax returns for millions of Americans. Our members provide services to individuals, not-for-profit organizations, small and medium-sized businesses, as well as America’s largest businesses.

We appreciate the opportunity to testify at the hearing on the proposed regulations. Please feel free to contact me at (408) 924-3508 or Annette.Nellen@sjsu.edu; Michael Greenwald, Chair, AICPA Partnership Taxation Technical Resource Panel, at (212) 842-7513 or MGreenwald@friedmanllp.com; or Jonathan Horn, Senior Manager – AICPA Tax Policy & Advocacy, at (202) 434-9204 or jonathan.horn@aicpa-cima.com.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Annette Nellen". The signature is fluid and cursive, with the first name being more prominent.

Annette Nellen, CPA, CGMA, Esq.
Chair, AICPA Tax Executive Committee

cc: Jennifer Black, Attorney, Office of Associate Chief Counsel (Procedure and Administration), Internal Revenue Service
Regina Johnson, Publication Regulation Specialist, Internal Revenue Service

AMERICAN INSTITUTE OF CPAs

Outline of Testimony on Proposed Regulations (REG-136118-15)
Regarding the Centralized Partnership Audit Regime
([REG-136118-15](#), Docket ID [IRS-2017-0009](#))

Submitted for the September 18, 2017 Public Hearing

Speaker: Michael Greenwald

I. Recommendations

- A. Prop. Reg. § 301.6225-4 regarding adjustments to partners' outside bases and capital accounts and a partnership's basis and book value in property. (3 minutes)
- B. Prop. Reg. § 301.6226-4 regarding adjustments to partners' outside bases and capital accounts and a partnership's basis and book value in property. (2 minutes)
- C. Prop. Reg. § 301.6226-3(e) regarding adjustments taken into account by partners who are pass-through partners. (3 minutes)

II. Selected areas of concern regarding procedural rules

- A. Partnership access to IRS Appeals process during audit (1 minute)
- B. Partnership Representative designation and replacement (1 minute)