

# Table of Contents

<b>Introduction.....</b>	<b>1</b>
<b>Eligibility .....</b>	<b>1</b>
U.S. citizen.....	2
Resident alien .....	2
Resident of Puerto Rico.....	2
Domestic corporation .....	3
Nonresident alien and foreign corporation .....	3
<b>Qualifying Foreign Taxes .....</b>	<b>3</b>
Tax must be imposed .....	4
Foreign country .....	4
U.S. possessions .....	4
Tax must have been paid or accrued.....	5
Joint return.....	5
Combined income.....	5
Partner or S corporation shareholder .....	6
Beneficiary .....	6
Mutual fund shareholder .....	6
Controlled foreign corporation shareholder.....	6
Tax must be the legal and actual foreign tax liability .....	7
Foreign tax refund.....	7
Subsidy received.....	8
Shareholder receiving refund for corporate tax in integrated system....	8
Tax must be an income tax (or tax in lieu of income tax) .....	8
Income tax .....	9
<b>Taxes for Which Foreign Tax Credit is Not Allowed .....</b>	<b>13</b>
Taxes on excluded income .....	13
Taxes for which taxpayer can only take an itemized deduction .....	15
Taxes on foreign mineral income .....	16

Taxes from international boycott operations .....	17
A portion of taxes on combined foreign oil and gas income .....	17
Taxes of U.S. persons controlling foreign corporations and partnerships who fail to file required information returns .....	17
Taxes related to a foreign tax splitting event .....	18
<b>Computing the Foreign Tax Credit.....</b>	<b>18</b>
<b>Foreign Currency Conversion .....</b>	<b>19</b>
<b>Limitation on Foreign Tax Credit .....</b>	<b>19</b>
<b>Foreign Source Income .....</b>	<b>25</b>
<b>U.S Source Income.....</b>	<b>26</b>
<b>Carryback and Carryforward of Excess Foreign Tax .....</b>	<b>27</b>
<b>AMT Foreign Tax Credit.....</b>	<b>29</b>
<b>Claiming a Deduction Versus Credit .....</b>	<b>29</b>
<b>Foreign Income Redeterminations.....</b>	<b>31</b>
<b>Income Matching .....</b>	<b>32</b>
<b>Direct Foreign Tax Credit.....</b>	<b>33</b>
<b>Indirect Foreign Tax Credit.....</b>	<b>33</b>
<b>Form 1116 – General Instructions.....</b>	<b>33</b>
<b>Preparing Form 1116 .....</b>	<b>34</b>
Above Part I .....	34
Part I: Taxable Income or Loss from Sources Outside the United States .	35
Part II: Foreign Taxes Paid or Accrued .....	36
Part III: Figuring the Credit.....	37
Part IV: Summary of Credits from Separate Parts III .....	39
<b>Comprehensive Example .....</b>	<b>40</b>
<b>Index .....</b>	<b>61</b>