



Massachusetts Department of Revenue

Schedule ABI

Exceptions to the Add Back of Interest Expenses

2023

Enclose this schedule to claim an exception to the requirement under MGL ch 63, §§ 31J, 31K to add back to net income related member interest expenses and costs. Complete a separate schedule for each transaction with a related member as to which an exception is claimed.

Name of taxpayer Federal Identification number For tax year beginning Ending

Related member reporting the income Federal Identification number For tax year beginning Ending

Name of jurisdiction(s) in which related member is taxed on net income (if applicable) Unitary business identifier

Principal reporting corporation (if applicable) Federal Identification number For tax year beginning Ending

Deduction claimed is taken on:

- Form 355U, Schedule U-E Form 355U, Schedule U-MTI Form 355 or 355S, Schedule E Other

Total Exceptions Claimed

- 1 Amount from Exception 1, line 7
2 Amount from Exception 2, line 15f
3 Amount from Exception 3, line 1
4 Total add back exception claimed. Add lines 1 through 3. Enter here and on appropriate corporate return

Exception 1. Full exception for interest paid, accrued or incurred to a related member that is taxed at a similar rate.

- 1 Amount of deductible interest expense or cost claimed by taxpayer
2 Actual tax rate applied to taxpayer (from Forms 355, 355U, 355S or 63 FI)
3 Tax rate(s) applied to the corresponding interest income from the related member's return(s). Do not enter the tax rate of a jurisdiction in which the related member is filing with the taxpayer on a combined or unitary basis.
3a Tax rate from related member's return
3b Tax rate from related member's return
3c Tax rate from related member's return
3d Tax rate from related member's return
3e Tax rate from related member's return
4 Related member apportionment percentage(s) for the jurisdiction(s) referenced in line 3. Enter "1" if the related member is taxable in only one jurisdiction and therefore not subject to apportionment.
4a Related member's apportionment percentage
4b Related member's apportionment percentage
4c Related member's apportionment percentage
4d Related member's apportionment percentage
4e Related member's apportionment percentage



| Name of taxpayer | Federal Identification number | For tax year beginning | Ending |
|------------------|-------------------------------|------------------------|--------|
|------------------|-------------------------------|------------------------|--------|

Exception 1 (cont'd.)

5 Multiply line 3 by line 4. Where the related member is taxed in more than one jurisdiction, multiply the respective responses from lines 3 and 4.

| | | |
|--|-----------|----------------------|
| 5a | 5a | <input type="text"/> |
| 5b | 5b | <input type="text"/> |
| 5c | 5c | <input type="text"/> |
| 5d | 5d | <input type="text"/> |
| 5e Apportioned tax rate | 5e | <input type="text"/> |
| 5f Add lines 5a through 5e | 5f | <input type="text"/> |
| 6 Subtract line 5f from line 2 | 6 | <input type="text"/> |
| 7 Exception amount claimed. If line 6 is equal to or less than .03, enter the amount from line 1 here and in Total Exceptions Claimed, line 1. Otherwise, enter "0" | 7 | <input type="text"/> |

Exception 2. Partial exception for interest paid, accrued or incurred to a related member.

Do not complete this section if you have claimed Exception 1 as to the same interest expense or cost add back. Complete this section only if the interest expense or cost was reported as income by the related member and, if applicable, the tax reported by the related member on that return exceeded the minimum tax.

| | | |
|---|-----------|----------------------|
| 1 Amount of deductible interest expense or cost claimed by taxpayer | 1 | <input type="text"/> |
| 2 Taxpayer's apportionment percentage from apportionment schedule, line 5. Enter "1" if an apportionment schedule was not filed | 2 | <input type="text"/> |
| 3 Multiply line 1 by line 2 | 3 | <input type="text"/> |
| 4 Tax rate applied to taxpayer (from Forms 355, 355U, 355S or 63 FI) | 4 | <input type="text"/> |
| 5 Multiply line 3 by line 4 | 5 | <input type="text"/> |
| 6 Total interest expense or cost incurred to related member by all other related members including taxpayer | 6 | <input type="text"/> |
| 7 Divide line 1 by line 6 | 7 | <input type="text"/> |
| 8 For each of the jurisdictions where the related member is taxed, enter the related member's net income. Do not enter any amount for a jurisdiction in which the related entity is filing with the taxpayer on a combined or unitary basis. | | |
| 8a Related member's net income | 8a | <input type="text"/> |
| 8b Related member's net income | 8b | <input type="text"/> |
| 8c Related member's net income | 8c | <input type="text"/> |
| 8d Related member's net income | 8d | <input type="text"/> |
| 8e Related member's net income | 8e | <input type="text"/> |
| 9 Multiply line 7 by line 8. Where the related member is taxed in more than one jurisdiction, multiply the respective responses from lines 7 and 8. | | |
| 9a | 9a | <input type="text"/> |
| 9b | 9b | <input type="text"/> |
| 9c | 9c | <input type="text"/> |
| 9d | 9d | <input type="text"/> |
| 9e | 9e | <input type="text"/> |



Name of taxpayer Federal Identification number For tax year beginning Ending

Exception 2 (cont'd.)

10 For each jurisdiction referenced in line 8, enter amount from line 1 or line 9, whichever is lesser. 10a 10b 10c 10d 10e
11 Provide related member apportionment percentages for jurisdiction(s) referenced in line 8. Enter "1" if the related member is taxable in only one jurisdiction and therefore not subject to apportionment. 11a 11b 11c 11d 11e
12 Multiply line 10 by line 11. Where the related member is taxed in more than one jurisdiction, multiply the respective responses from lines 10 and 11. 12a 12b 12c 12d 12e
13 For each jurisdiction referenced in line 8, enter tax rate(s) applied to the related entity. 13a 13b 13c 13d 13e
14 Divide each rate in line 13 by line 4. Do not enter more than "1". 14a 14b 14c 14d 14e



| Name of taxpayer | Federal Identification number | For tax year beginning | Ending |
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Exception 2 (cont'd.)

15 Exception amount claimed. Multiply line 12 by line 14. Where the related member is taxed in more than one jurisdiction, multiply the respective responses from lines 12 and 14. Enter here and in Total Exceptions Claimed, line 2.

| | | |
|---|------------|----------------------|
| 15a | 15a | <input type="text"/> |
| 15b | 15b | <input type="text"/> |
| 15c | 15c | <input type="text"/> |
| 15d | 15d | <input type="text"/> |
| 15e | 15e | <input type="text"/> |
| 15f Add lines 15a through 15e..... | 15f | <input type="text"/> |

Exception 3. Exception based on supporting statement.

Taxpayer must prepare with its tax return and make available to the Commissioner upon request a supporting statement prepared in accordance with the Department's public written statements. All double tax exception claims must be made by answering the questions in Exception 1 or 2.

Basis for this claim (fill in only one): Business purpose or economic substance Section 31K foreign treaty exception

| | | |
|--|----------|-----------------------|
| 1 Amount of deductible interest claimed by taxpayer. Enter here and in Total Exceptions Claimed, line 3 | 1 | <input type="text"/> |
| 2 Name of the related member to which the taxpayer paid, accrued or incurred the interest expense or cost ▶ | | <input type="text"/> |
| 3 Federal Identification number of the related member to which taxpayer paid, accrued or incurred the interest expense or cost. | 3 | <input type="text"/> |
| 4 Date the underlying debt or liability was originally incurred (if the expense or cost was paid, accrued or incurred pursuant to a note or similar obligation, date of the note or instrument). | 4 | <input type="text"/> |
| 5 Dollar amount of the underlying debt or liability as originally incurred | 5 | <input type="text"/> |
| 6 Outstanding dollar amount of debt or liability at the end of tax year covered by this return | 6 | <input type="text"/> |
| 7 If the underlying debt or liability has a fixed term, enter the termination date. | 7 | <input type="text"/> |
| 8 Interest rate on the underlying debt or liability (if a variable rate, enter effective date for the period covered by this return) | 8 | <input type="text"/> |
| 9 If the taxpayer is seeking section 31K exception, enter name of the foreign nation in which the related member is resident | 9 | <input type="text"/> |
| 10 Fill in if interest expense or cost paid, accrued or incurred was pursuant to a note or similar instrument | | <input type="radio"/> |
| 11 Fill in if answer to line 10 is Yes and the interest expense or cost paid, accrued or incurred was in connection with a dividend note or similar instrument. | | <input type="radio"/> |
| 12 Fill in if taxpayer asserted an add back exception in connection with the debt or liability on its Massachusetts tax return for a prior year | | <input type="radio"/> |
| 13 Fill in if interest expense or cost was actually paid (e.g., as opposed to accrued) | | <input type="radio"/> |
| 14 Fill in if answer to line 13 is Yes and the amount paid was substantially returned to the taxpayer, either directly or indirectly, during the tax year (e.g., through the means of a dividend, loan, etc.) | | <input type="radio"/> |
| 15 Fill in if underlying transaction was entered into in whole or in part on the advice of a tax advisor | | <input type="radio"/> |
| 16 Fill in if reduction of tax was a principal purpose for the underlying transaction | | <input type="radio"/> |
| 17 Fill in if interest expense or cost was result of the taxpayer participating in a cash management, cash sweep or similar arrangement or system ... | | <input type="radio"/> |
| 18 Fill in if amount of interest expense or cost was the result of or supported by a written study or appraisal | | <input type="radio"/> |
| 19 Provide greater detail, if necessary, concerning Exception 3 claim | | <input type="text"/> |