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The final tangible property regulations are a 2014 tax return consideration that has not received much attention until fairly recently. These regulations, which generally apply to tax years beginning on or after 1/1/14, cover amounts paid to acquire, produce or improve tangible property (see TD 9636). In doing so, they provide criteria for determining the unit of property, which is the first step for determining whether expenditures to improve tangible property must be capitalized or can be currently expensed. The regulations also change the definition of and rules for accounting for materials and supplies. A second set of final regulations (see TD 9689) provides rules for determining gain or loss upon the disposition of MACRS property, including partial dispositions of property.

Some of the favorable provisions in the final tangible property regulations are obtained by making an election on the tax return, while others may require a change in accounting method. A method of accounting for tax purposes is the consistent treatment of a material item in computing taxable income. Examples of material capital items related to the tangible property regulations are units of property, capital expenditures and repairs and maintenance. The final regulations reconcile previous guidance regarding the tax treatment of these material items and also add new rules. Hence, it is unlikely that a taxpayer in existence before 2014 will have accounting methods for tangible property that comply with the final regulations. As such, many taxpayers that do not qualify for the simplified method (see Relief for Small Businesses, on the following page) will have to File Form 3115 (Application for Change in Accounting Method) to obtain consent from the IRS to change their accounting methods to comply with the final tangible property regulations.

Note: In a February 10 Tax Talk Today presentation, an IRS representative stated that businesses capitalizing or depreciating property must be in compliance with the new regulations starting with the first year beginning after 2013 (the 2014 tax year). However, if a business started in 2012 or 2013 and its returns were prepared in full consideration of the regulations, a Form 3115 would not be required.
TYPE OF CLIENTS: All businesses, including sole proprietors, partnerships, lessors of real property and corporations

SITUATION: Businesses with tangible property, repairs and maintenance or materials and supplies or who dispose of MACRS property must comply with final regulations starting with their 2014 tax year. This may include filing Form 3115 to change their accounting method

DEADLINE: The due date, including extensions, for filing the business’ 2014 return

TAX ACTION REQUIRED: Determine whether a Form 3115 should be filed to request an automatic accounting method change to comply with the tangible property regulations

Required Accounting Method Changes

Common accounting method changes potentially required to comply with the final tangible property regulations are found in Rev. Proc. 2015-14 as follows:

- Section 10.11, Tangible property
- Section 6.33, Late partial disposition election
- Section 6.38, Disposition of a building or structural component
- Section 6.39, Dispositions of tangible depreciable assets (other than a building or its structural components)

Relief for Small Businesses

On February 13, 2015, the IRS released Rev. Proc. 2015-20, which provides a simplified method for qualifying small businesses to comply with the final tangible property regulations. As noted earlier, taxpayers get IRS permission to change accounting methods by filing Form 3115. In many cases, this includes computing a Section 481(a) adjustment to account for how the taxpayer treated the items being changed in prior years to avoid the duplication of deductions or the omission of income.

Under the simplified method, small businesses that change their accounting methods to comply with the final tangible property regulations can do so in their first tax year beginning after 2013 without filing Form 3115. Also, if they make the change for their 2014 tax year, the change is made without a Section 481(a) adjustment. Instead, the new rules under the final regulations are applied starting with the 2014 tax year.

The new simplified procedure can be used by small businesses for each separate trade or business that has (1) assets totaling less than $10 million on the first day of the year the business first applies the regulations (e.g., 1/1/14), or (2) average annual gross receipts of $10 million or less for the prior three years. So if there are multiple trades or businesses, some may qualify and some may not.

Specifically, Rev. Proc. 2015-20 applies to accounting method changes and designated change numbers (DCNs) described in Rev. Proc. 2015-14 as follows:

- Sec. 10.11(3)(a), Tangible property (DCNs 184, 185, 186, 187, 188, 189, 190, 191, 192, and 193)
- Sec. 6.37(3)(a), Identifying the asset or portion of an asset sold (DCN 200)
- Sec. 6.38, Dispositions of a building or structural component (DCN 205)
- Sec. 6.39, Dispositions of tangible depreciable assets (other than a building or its structural components) (DCN 206)
Qualifying small businesses using the simplified method must do so consistently. For example, if the changes under Rev. Proc. 2015-14, Sec. 10.11(3)(a) are made under the simplified method without a Section 481(a) adjustment (i.e., without taking into account amounts paid or incurred in prior tax years), any changes in accounting for dispositions under Rev. Proc. 2015-14, Secs. 6.38 and 6.39 must also be made without a Section 481(a) adjustment, and vice versa. Also, taxpayers who use the simplified method to make the changes listed above cannot make a late partial disposition election under Rev. Proc. 2015-14, Sec. 6.33.

**Strategy:** Although not required to file Form 3115 and compute a Section 481(a) adjustment, in certain situations, small businesses can benefit from doing so. For example, a taxpayer whose Section 481(a) adjustment would be negative because, in years before 2014, it capitalized items that can be deducted currently under the final regulations should consider filing the Form 3115 so it can deduct the negative Section 481(a) adjustment in 2014. Or, a taxpayer may want to file Form 3115 for all its accounting method changes under the tangible property regulations so that it can make a late partial disposition election. Also, unlike taxpayers who file a Form 3115 to request an accounting method change, taxpayers who use the simplified method to change their accounting method(s) to comply with the tangible property regulations generally do not receive audit protection for tax years beginning before 2014.

**Note:** Taxpayers who qualify for relief under Rev. Proc. 2015-20 and who have already filed a Form 3115 to request an accounting method change listed above can withdraw their Form 3115 by filing an amended return using the simplified method. The amended return must be filed by the extended due date of the return for the 2014 tax year.

**Requesting an Automatic Change on Form 3115**

Taxpayers that cannot or choose not to apply Rev. Proc. 2015-20 can receive automatic consent from the IRS to make accounting method changes under the final tangible property regulations by filing Form 3115. The general procedures for filing a change in accounting method are found in Rev. Proc. 2015-13. Rev. Proc. 2015-14 provides specific rules for changing a taxpayer’s accounting method(s) to comply with the final tangible property regulations, including the Designated Change Number (DCN) for the changes potentially required. These two revenue procedures, along with the instructions to the Form 3115, provide the basis for preparing and filing Form 3115 for the tangible property regulations.

According to Part II, Line 12, of Form 3115, if the taxpayer is not changing its overall method of accounting (cash or accrual), it should attach a detailed and complete description of all the following items:

1. The item(s) being changed
2. The present method for the item(s) being changed
3. The proposed method for the item(s) being changed
4. The present overall method of accounting (cash, accrual or hybrid)

In addition to the forgoing, Rev. Proc. 2015-14 requires taxpayers to:

1. Cite the final or temporary regulation that provides or authorizes the proposed method for the item(s) being changed.
2. Describe the unit(s) of property, building structure(s) or building system(s) used under the present and proposed methods of accounting, with a citation to the regulation under which the unit of property is permitted, if they want to change any unit(s) of property or the identification of any building structure(s) or building system(s) for determining whether amounts are deducted as repair and maintenance costs or capitalized as improvement costs.
3. Complete Schedule E of Form 3115 if they will be capitalizing amounts paid or incurred and depreciating such property under IRC Sec. 167 or 168.
**Practice Tip:** It is important to note that the current revision of Form 3115 is December 2009. The IRS has stated that it intends to update the Form 3115 to include references to the final tangible property regulations. Be sure to use the most current revision when you prepare the Form(s) 3115 for your client.

Rev. Proc. 2015-14, section 10.11(7)(a), contains a table listing DCNs for the various changes required by the tangible property regulations, while section 6.41(1) contains a similar table for changes required by the disposition of MACRS property regulations. You’ll need to review these tables to determine which method changes are required for your clients. Form 3115 filed to comply with the tangible property regulations will typically request a concurrent method change for multiple DCNs from #184–193. Late partial asset disposition elections (available only through 2014) are made with DCN #196. A change from depreciating a disposed asset (or portion of an asset) to recognizing gain or loss upon a disposition is DCN #205/206.

Taxpayers should request all method changes described in Rev. Proc. 2015-14, Section 10.11, on a single Form 3115. This concurrent method change might include their method of accounting for materials and supplies (DCN #186 and 187), repairs and maintenance (DCN #184), capitalization and units of property (DCN #184), acquisition and production costs (DCN #192) and real property investigatory costs (DCN #193). Depending on the facts, some taxpayers may require fewer or additional method changes.

The Form 3115 should be attached to the taxpayer’s timely-filed (including extensions) tax return for the year of change. More importantly, a copy of the Form 3115 must be filed with the IRS Office in Ogden, Utah, no later than the date the original tax return is filed.

**Short Form 3115 for Qualifying Taxpayers**

Most of the designated change procedures allow qualifying small taxpayers to use a short Form 3115. A short Form 3115 is not actually a different form, but means that the taxpayer is required to provide less information on the standard Form 3115. Generally, a qualifying small taxpayer is a taxpayer whose average annual gross receipts are $10 million or less for the three preceding tax years. These taxpayers may not be required to file Form 3115 under Rev. Proc. 2015-20, but may choose to do so. In that case, they may use the short Form 3115.

When a short Form 3115 can be filed, a qualifying small taxpayer should only complete the following on Form 3115:

- The identification section of page 1 (above Part I)
- The signature section at the bottom of page 1
- Part I, line 1(a), which is the DCN for the requested change(s)
- Part II, all lines except lines 11, 13, 14, 15 and 17
- Part II, line 13, if the change is to depreciating property
- Part IV, lines 25 and 26
- Schedule E, concerning changes in depreciation or amortization, if applicable

The following are some key issues to consider while preparing a Form 3115 for a qualifying small taxpayer:

1. **Name of Filer** — Include both spouses and each SSN if filing a joint return.

2. **Name of Applicants** — One Form 3115 can be prepared for wholly-owned companies or entities in a controlled group filing an identical change if each entity is changing to an identical proposed method from an identical present method of accounting. Include each entity’s name and EIN. Any Section 481(a) adjustments must be described separately for each entity. [See Rev. Proc. 2015-1, section 15.07(4).]

3. **Accounting Method Change** — Leave this area blank since no option for “capitalization” is available. “Other” is reserved for advance change requests.
4. **Part I, Line 1(a)** — Enter all DCNs included on a concurrent change request.

5. **Part I, Line 8** — Audit and ruling protection is normal in an automatic change request unless the taxpayer is under audit.

6. **Part I, Line 9** — If filing other Forms 3115 in consideration of the final tangible property regulations, include an explanation and cite to explain that the five-year eligibility limitation does not apply in order to prevent the application from being rejected. Also, include an explanation of any related party Forms 3115 that have been filed within the past five years, including in the current year.

7. **Part I, Line 10** — There may be pending Forms 3115 when filing a request under the tangible property regulations, so a description of the taxpayer, TIN, request change number and specific issues should be attached.

8. **Part II, Line 12** — Include a citation to the relevant regulation for the applicant’s proposed method(s) of accounting along with a detailed description of each item being changed.

9. **Part II, Line 13** — When changing to depreciating an item that was previously not depreciated, line 13 is required to describe the trade or business in detail. Schedule E will also be required in this instance. An example where this will be applicable is when a previously expensed repair or transaction cost is capitalized under the new accounting method.

10. **Part II, Line 16** — A conference with the IRS in case of an adverse response should always be requested. The applicant can also attach a request to fax documents for convenience.

11. **Part IV, Line 25** — Enter the Section 481(a) adjustment and attach a description of the computation. A 481(a) adjustment will occur when writing off improperly capitalized repairs and/or capitalizing costs that were previously written off. For each capital item included in the accounting method change, list the asset’s basis, accumulated depreciation and 481(a) adjustment that results from the change. It is efficient to include Schedule E details on the 481(a) statement.

12. **Schedule E** — This schedule is required when changing to capitalizing and depreciating an expenditure, such as capitalizing a repair that was previously expensed. Combining Schedule E information on the 481(a) statement is helpful for clear and efficient presentation of the information. Schedule E preparation will likely require an answer to line 13 of Part II.

**Sample Wording for Form 3115**

Any application for change in accounting method must be accurate and complete and include all relevant facts and information required by the applicable revenue procedure and Form 3115 instructions. Answering the questions carefully is essential to ensuring the IRS processes the application successfully. Providing concise answers and clean formatting are also good practices for ensuring success. Appendix 1 contains a sample format. Appendix 2 provides examples of language that might be used to provide the information required to make some of the more common automatic accounting method changes required by the final tangible property regulations.

**Editor’s Note:** This language in Appendix 2 is based on an assumed set of facts. Your clients’ fact patterns will likely be different. For example, Part II, Line 12b requires a description of the taxpayer’s present accounting method. Your clients’ present accounting method may be different than the present accounting method described in Appendix 2.

**Conclusion**

Even if a small business qualifies for the Rev. Proc. 2015-20 simplified method, it may be beneficial to choose to file a Form 3115 and compute any Section 481(a) adjustment to change its accounting method(s) to comply with the final tangible property regulations. Be on the lookout for situations where complying with the final regulations would result in a negative Section 481(a) adjustment. Even though filing a Form 3115 can be time-consuming, this can be a great opportunity to help your clients and you should bill them accordingly. Also, keep in mind the benefits of audit protection and the ability to make a late partial disposition election when the Form 3115 is filed.
Practice Tip: Additional guidance is still expected in this area. In Rev. Proc. 2015-20, the IRS requests comments about whether the threshold for the de minimis exception should be raised. The IRS has said that it intends to issue a list of Frequently Asked Questions dealing with accounting method changes to comply with the tangible property regulations. And, as noted earlier, the IRS plans to revise the Form 3115 for accounting method changes under the tangible property regulations. So, we recommend that you extend tax returns for any clients that may need to file the Form 3115 or who may benefit from doing so.

References:

IRC Secs. 167, 168, and 481(a).

Subscriber Note: The author of this article, Tyler Anderson, CPA, is the designated firm expert on the final Tangible Property Regulations (TPRs) at Johnson Goff & Company where he consults with small CPA firms on TPR implementation and the required Forms 3115. Tyler is a contributor to the Arizona Society of CPAs and has presented publicly on issues of the tangible property regulations. He can be reached at 480.948.0060 or at tylera@johnsongoff.com.

Appendix 1

Sample Format for Form 3115 Attachments

Note: The following is a sample format of an attachment to Form 3115.

Name of Taxpayer
Identification Number
Attachment to Form 3115, Part II, Line 12

Item(s) being changed:__________________________________________________________________________________________________________
________________________________________________________________________________________________________________________________

Present method for item(s) being changed:_____________________________________________________________________________________
________________________________________________________________________________________________________________________________

Proposed method for item(s) being changed:___________________________________________________________________________________
________________________________________________________________________________________________________________________________

Regulation authorizing the proposed method:_________________________________________________________________________________

Present overall accounting method:___________________________________________________________________________________________
Appendix 2

Sample Language for Form 3115 Attachments

Note: The sample language in Appendix 2 is based on an assumed set of facts. Your client’s fact patterns will likely be different. The language in the client’s Form 3115 should be adapted to fit the client’s unique situation. The taxpayer in this Appendix intends to make the following automatically approved accounting method changes:

<table>
<thead>
<tr>
<th>Number</th>
<th>Description of Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>184</td>
<td>Change to Deducting Repairs, Capitalizing Improvements and Identifying Units of Property</td>
</tr>
<tr>
<td>186</td>
<td>Change to Deducting Nonincidental Materials and Supplies to When Used or Consumed</td>
</tr>
<tr>
<td>187</td>
<td>Change to Deducting Incidental Materials and Supplies to When Paid or Incurred</td>
</tr>
<tr>
<td>192</td>
<td>Change to Capitalizing Acquisition or Production Costs and Depreciating, if Applicable</td>
</tr>
</tbody>
</table>

ABC Incorporated
75-1234567
Attachment to Form 3115, Part II, Line 12
Explanation of Present and Proposed Methods of Accounting

Items Being Changed: The taxpayer is changing its methods of accounting to comply with the final tangible property regulations via the following concurrent automatic method changes under Rev. Proc. 2015-14, Sec. 10.11(5).

Present Method for Items Being Changed: Taxpayer currently uses the following methods of accounting:

Repairs and Maintenance: Expenditures that bring tangible property back to their normal operating condition are deducted as ordinary business expenses under IRC Sec. 162.

Capital Expenditures: Large capital expenditures are normally capitalized.

Improvement Costs: Generally, asset upgrades, additions, and enhancements are capitalized.

Unit of Property (UOP): Each itemized fixed asset on taxpayer’s depreciation schedule is generally considered to be a unit of property.

Routine Maintenance: The safe harbor of Reg. 1.263(a)-3(i) is not currently being utilized, nor could it have been used. However, normal expenditures that keep property in its ordinarily efficient operating condition are deducted as ordinary and necessary business expenses.

Capitalization Criteria: The taxpayer analyzes the facts and circumstances to determine whether an expenditure should be capitalized. For instance, expenditures for assets with a useful life greater than one year are typically capitalized.

Materials and Supplies: The cost of materials and supplies is currently deducted in the year paid or incurred.

Acquisition Costs: Amounts paid in connection with the acquisition of an asset generally are capitalized as part of the new fixed asset. These costs are deducted if the asset is not actually acquired.
Proposed Method for Items Being Changed: Taxpayer proposes to adopt the rules contained in the final tangible property regulations as follows:

**DCN #184**
- Reg. 1.263(a)-1(a) General rule for capital expenditures
- Reg. 1.162-4(a) Deduct repairs and maintenance
- Reg. 1.263(a)-3 Amounts paid to improve tangible property
- Reg. 1.263(a)-3(b) Definitions, amounts paid to improve property
- Reg. 1.263(a)-3(d) Requirement to capitalize improvement costs
- Reg. 1.263(a)-3(e) Determining the unit of property
- Reg. 1.263(a)-3(g)(1) Certain costs incurred during an improvement
- Reg. 1.263(a)-3(l) Safe harbor for routine maintenance on property
- Reg. 1.263(a)-3(j) Capitalization of betterments
- Reg. 1.263(a)-3(k) Capitalization of restorations
- Reg. 1.263(a)-3(l) Capitalization of adaptations to a new or different use
- Reg. 1.263(a)-3(l)(2) Capitalization of new or different building adaptations
- Reg. 1.263(a)-3(o) Treatment of capital expenditures
- Reg. 1.263(a)-3(p) Recovery of capitalized amounts

**DCN #186**
- Reg. 1.162-3(a)(1) Nonincidental materials and supplies
- Reg. 1.162-3(c) Materials and supplies definition

**DCN #187**
- Reg. 1.162-3(a)(2) Incidental materials and supplies
- Reg. 1.162-3(c) Materials and supplies definition

**DCN #192**
- Reg. 1.263(a)-2 Amounts paid to acquire or produce tangible property
- Reg. 1.263(a)-2(d) Requirement to capitalize acquired or produced property
- Reg. 1.263(a)-2(e) Defense or perfection of title to property
- Reg. 1.263(a)-2(f) Transaction costs to facilitate acquisition
- Reg. 1.263(a)-2(g) Treatment of capital expenditures
- Reg. 1.263(a)-2(h) Recovery of capitalized amounts

Regulation Authorizing the Proposed Method: Taxpayer proposes to change to the following specific methods of accounting:

**Repairs and Maintenance:** Under Reg. 1.162-4, taxpayer will currently deduct repair and maintenance expenditures related to tangible property that otherwise would not have to be capitalized underRegs. 1.263(a)-1, 1.263(a)-2, 1.263(a)-3 or any other regulation.

**Capital Expenditures:** Taxpayer will employ the general rules and definitions related to acquisition and improvement expenditures under Reg. 1.263(a)-1, along withRegs. 1.263(a)-2, 1.263(a)-3 and 1.162-4, to determine when an expenditure should be expensed or capitalized.
Appendix 2
Sample Language for Form 3115 Attachments (Continued)

**Improvement Costs:** Taxpayer will adopt Reg. 1.263(a)-3, along with Regs. 1.263(a)-1, 1.263(a)-2 and 1.162-4, to determine when an expenditure should be expensed or capitalized.

**Unit of Property:** Taxpayer will employ the criteria in Reg. 1.263(a)-3(e) for determining a unit of property (UOP). Each building and its structural components will be treated as a UOP.

**Routine Maintenance:** Taxpayer will adopt the routine maintenance safe harbor in Reg. 1.263(a)-3(i) as its method of accounting for routine maintenance expenditures.

**Capitalization Criteria:** Taxpayer will follow the Reg. 1.263(a)-3 restoration, adaptation and betterment qualitative criteria and improvement cost criteria, along with all other final tangible property regulations, in determining whether an expenditure should be expensed or capitalized.

**Nonincidental Materials and Supplies:** Taxpayer will deduct amounts paid to acquire or produce nonincidental materials and supplies expenses in the tax year in which they are first used or consumed in the taxpayer’s operations under Reg. 1.162-3(a)(1).

**Incidental Materials and Supplies:** Taxpayer will deduct amounts paid to acquire or produce incidental materials and supplies for which no record of consumption is kept or physical inventories are taken at the beginning and end of the tax year in the tax year they are paid under Reg. 1.162-3(a)(2).

**Acquisition Costs:** Taxpayer will capitalize production, transaction and facilitative acquisition costs under Reg. 1.263(a)-2 and will adopt the “whether and which” rule of Reg. 1.263(a)-2(f)(2)(iii) for handling investigatory costs.

**Present Overall Accounting Method:** Taxpayer uses the accrual method of accounting.

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**ABC Incorporated**  
75-1234567  
Attachment to Form 3115, Part IV, Line 25 and Schedule E  
Explanation and Computation of Section 481(a) Adjustment and Change in Depreciation or Amortization

A Section 481(a) adjustment is required to account for amounts that were capitalized under the taxpayer’s former accounting method but are treated as currently deductible repairs under the final tangible property regulations (Reg. 1.162-4). Likewise, an adjustment is required for costs that were expensed under the taxpayer’s former accounting method but are capitalized under the final tangible property regulations [Reg.1.263(a)-2]. The Section 481(a) adjustments for each DCN are as follows:

1. **DCN #184:** Under its previous accounting method, the taxpayer capitalized as 39, 27.5, 15, 10 and five-year property various expenditures totaling $60,931 from 1991 through 2013. Accumulated depreciation on those assets was $15,231 as of December 31, 2013. Under the final tangible property regulations, these amounts should have been deducted currently as Section 162 repair and maintenance expenses. This results in a negative Section 481(a) adjustment of $45,700 ($60,931 − $15,231).

2. **DCN #192:** Under its previous accounting method, the taxpayer deducted transaction costs of $2,387 related to the acquisition of nonresidential real property as Section 162 ordinary and necessary business expenses. Under the final tangible property regulations [Reg. 1.263(a)-2], these costs should be capitalized as 39-year property. Accumulated depreciation on that amount would have been $245 as of December 31, 2013, resulting in a positive Section 481(a) adjustment of $2,142 ($2,387 − $245).

See the following for a detailed computation of the adjustment:
## Appendix 2

Sample Language for Form 3115 Attachments (Continued)

### ABC Incorporated — 75-1234567

<table>
<thead>
<tr>
<th>Property Description</th>
<th>Line 6(a)</th>
<th>Line 6(b)</th>
<th>Line 6(c)</th>
<th>Line 6(d)</th>
<th>Line 6(e)</th>
<th>Line 6(f)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Date Placed in Service</td>
<td>Rev Proc 97-56 Asset Class</td>
<td>Depreciation Method As Filed</td>
<td>Depreciation Method As Filed</td>
<td>Recovery Period (yrs) under Proposed Method</td>
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<td>*</td>
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<tr>
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<td>*</td>
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<td>*</td>
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<tr>
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<td>27.5</td>
<td>*</td>
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<td>39</td>
<td>*</td>
</tr>
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<td>Service A/C</td>
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<td>27.5</td>
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<td>*</td>
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<td>*</td>
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<td>57.0</td>
<td>S/L</td>
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</tbody>
</table>

**Total Adjustment to taxable income:**

60,931 | 15,231 | (45,700)

---

2. Adjustment to properly capitalize facilitative transaction costs under the proposed accounting method (DCN 192)

<table>
<thead>
<tr>
<th>Costing Costs</th>
<th>Line 6(a)</th>
<th>Line 6(b)</th>
<th>Line 6(c)</th>
<th>Line 6(d)</th>
<th>Line 6(e)</th>
<th>Line 6(f)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing Costs</td>
<td>8/1/2012</td>
<td>57.0</td>
<td>** S/L</td>
<td>** 39</td>
<td>** Mid-Month</td>
<td>2,387</td>
</tr>
</tbody>
</table>

**Total Adjustment to taxable income:**

2,387 | 245 | 2,142

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*Depreciation under the proposed accounting method is not applicable. Instead, the taxpayer will deduct these expenditures according to the rules in the final tangible property regulations.

**Depreciation as filed is not applicable as the taxpayer deducted these expenditures under its former accounting method.

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Friday 3/13/15 from 2:00 p.m. – 4:00 p.m. CST
Thursday 3/26/15 from 12:00 p.m. – 2:00 p.m. CST
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