

Form **990-T**

**Exempt Organization Business Income Tax Return**  
(and proxy tax under section 6033(e))

OMB No. 1545-0687

**2008**

Department of the Treasury  
Internal Revenue Service

For calendar year 2008 or other tax year beginning 10/1/2008, and ending 9/30/2009 See separate instructions.

Open to Public Inspection for 501(c)(3) Organizations Only

A <input type="checkbox"/> Check box if address changed B Exempt under section <input checked="" type="checkbox"/> 501 ( c ) ( 3 ) <input type="checkbox"/> 408(e) <input type="checkbox"/> 220(e) <input type="checkbox"/> 408A <input type="checkbox"/> 530(a) <input type="checkbox"/> 529(a)	Print or Type Name of organization ( <input type="checkbox"/> Check box if name changed and see instructions.) National Public Radio, Inc dba NPR Number, street, and room or suite no. If a P.O. box, see page 9 of instructions. 635 Massachusetts Ave, NW City or town, state, and ZIP code Washington DC 20001	D Employer identification number (Employees' trust, see instructions for Block D on page 9.) 52-0907625
		E Unrelated business activity codes (See instructions for Block E on page 9.) 541800 515100

C Book value of all assets at end of year 225,110,192

F Group exemption number (See instructions for Block F on page 9.)

G Check organization type  501(c) corporation  501(c) trust  401(a) trust  Other trust

H Describe the organization's primary unrelated business activity. Unqualified Sponsorship

I During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group?  Yes  No  
If "Yes," enter the name and identifying number of the parent corporation.

J The books are in care of National Public Radio Telephone number 202-513-2000

Part I Unrelated Trade or Business Income		(A) Income	(B) Expenses	(C) Net
1 a	Gross receipts or sales <u>296,996</u>			
b	Less returns and allowances			
c	Balance	296,996		
2	Cost of goods sold (Schedule A, line 7)	175,106		
3	Gross profit. Subtract line 2 from line 1c	121,890		121,890
4 a	Capital gain net income (attach Schedule D)			
b	Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)			
c	Capital loss deduction for trusts			
5	Income (loss) from partnerships and S corporations (attach statement 1)	-88,212		-88,212
6	Rent income (Schedule C)			
7	Unrelated debt-financed income (Schedule E)	291,286	188,804	102,482
8	Interest, annuities, royalties, and rents from controlled organizations (Schedule F)			
9	Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)			
10	Exploited exempt activity income (Schedule I)	7,138,430	4,097,439	3,040,991
11	Advertising income (Schedule J)			
12	Other income (See page 11 of the instructions; attach schedule 2)	2,748,034		2,748,034
13	Total. Combine lines 3 through 12	10,211,428	4,286,243	5,925,185

Part II Deductions Not Taken Elsewhere (See page 11 of the instructions for limitations on deductions.)		(Except for contributions, deductions must be directly connected with the unrelated business income.)	
14	Compensation of officers, directors, and trustees (Schedule K)		44,052
15	Salaries and wages		
16	Repairs and maintenance		
17	Bad debts		
18	Interest (attach schedule)		
19	Taxes and licenses		100
20	Charitable contributions (See page 13 of the instructions for limitation rules.)		
21	Depreciation (attach Form 4562) See Statement 7	89,703	
22	Less depreciation claimed on Schedule A and elsewhere on return		89,703
23	Depletion		
24	Contributions to deferred compensation plans		
25	Employee benefit programs		
26	Excess exempt expenses (Schedule I)		3,040,991
27	Excess readership costs (Schedule J)		
28	Other deductions (attach schedule) See Statement 3		3,372,304
29	Total deductions. Add lines 14 through 28		6,547,150
30	Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13		-621,965
31	Net operating loss deduction (limited to the amount on line 30) See Statement 4		
32	Unrelated business taxable income before specific deduction. Subtract line 31 from line 30		-621,965
33	Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions.)		
34	Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is greater than line 32, enter the smaller of zero or line 32		-621,965

For Privacy Act and Paperwork Reduction Act Notice, see instructions.

**Part III Tax Computation**

<b>35 Organizations Taxable as Corporations.</b> See instructions for tax computation on page 15. Controlled group members (sections 1561 and 1563) check here <input type="checkbox"/> See instructions and:			
<b>a</b> Enter your share of the \$50,000, \$25,000, and \$9,925,000 taxable income brackets (in that order): (1) \$ _____ (2) \$ _____ (3) \$ _____			
<b>b</b> Enter organization's share of: (1) Additional 5% tax (not more than \$11,750) . . . . . \$ _____ (2) Additional 3% tax (not more than \$100,000) . . . . . \$ _____			
<b>c</b> Income tax on the amount on line 34 . . . . . ▶		<b>35c</b>	
<b>36 Trusts Taxable at Trust Rates.</b> See instructions for tax computation on page 16. Income tax on the amount on line 34 from: <input type="checkbox"/> Tax rate schedule or <input type="checkbox"/> Schedule D (Form 1041) . . . . . ▶		<b>36</b>	
<b>37 Proxy tax.</b> See page 16 of the instructions . . . . . ▶		<b>37</b>	
<b>38 Alternative minimum tax</b> . . . . .		<b>38</b>	
<b>39 Total.</b> Add lines 37 and 38 to line 35c or 36, whichever applies . . . . .		<b>39</b>	0

**Part IV Tax and Payments**

<b>40 a</b> Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) . . . . .	<b>40a</b>			
<b>b</b> Other credits (see page 17 of the instructions) . . . . .	<b>40b</b>			
<b>c</b> General business credit. Attach Form 3800 . . . . .	<b>40c</b>			
<b>d</b> Credit for prior year minimum tax (attach Form 8801 or 8827) . . . . .	<b>40d</b>			
<b>e Total credits.</b> Add lines 40a through 40d . . . . .		<b>40e</b>		0
<b>41</b> Subtract line 40e from line 39 . . . . .		<b>41</b>		0
<b>42</b> Other taxes. Check if from: <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 8611 <input type="checkbox"/> Form 8697 <input type="checkbox"/> Form 8866 <input type="checkbox"/> Other (attach schedule)		<b>42</b>		
<b>43 Total tax.</b> Add lines 41 and 42 . . . . .		<b>43</b>		0
<b>44 a</b> Payments: A 2007 overpayment credited to 2008 . . . . .	<b>44a</b>			
<b>b</b> 2008 estimated tax payments . . . . .	<b>44b</b>			
<b>c</b> Tax deposited with Form 8868 . . . . .	<b>44c</b>			
<b>d</b> Foreign organizations: Tax paid or withheld at source (see instructions) . . . . .	<b>44d</b>			
<b>e</b> Backup withholding (see instructions) . . . . .	<b>44e</b>			
<b>f</b> Other credits and payments: <input type="checkbox"/> Form 2439 _____ <input type="checkbox"/> Form 4136 _____ <input type="checkbox"/> Other _____ Total ▶	<b>44f</b>		0	
<b>45 Total payments.</b> Add lines 44a through 44f . . . . .		<b>45</b>		0
<b>46</b> Estimated tax penalty (see page 4 of the instructions). Check if Form 2220 is attached . . . . . <input type="checkbox"/>		<b>46</b>		
<b>47 Tax due.</b> If line 45 is less than the total of lines 43 and 46, enter amount owed . . . . . ▶		<b>47</b>		0
<b>48 Overpayment.</b> If line 45 is larger than the total of lines 43 and 46, enter amount overpaid . . . . . ▶		<b>48</b>		0
<b>49</b> Enter the amount of line 48 you want: <b>Credited to 2009 estimated tax</b> ▶ <b>Refunded</b> ▶		<b>49</b>		0

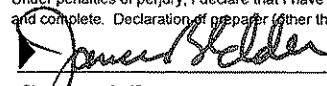
**Part V Statements Regarding Certain Activities and Other Information** (see instructions on page 18)

<b>1</b> At any time during the 2008 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If YES, the organization may have to file Form TD F 90-22.1, Report of Foreign Bank and Financial Accounts. If YES, enter the name of the foreign country here ▶ <u>Germany, Russia &amp; Iraq</u>	Yes	No
<b>2</b> During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If YES, see page 5 of the instructions for other forms the organization may have to file.		X
<b>3</b> Enter the amount of tax-exempt interest received or accrued during the tax year ▶ \$ _____		


**Schedule A—Cost of Goods Sold.** Enter method of inventory valuation ▶ Fair Value

<b>1</b> Inventory at beginning of year . . . . .	<b>1</b>			<b>6</b> Inventory at end of year . . . . .	<b>6</b>	
<b>2</b> Purchases . . . . .	<b>2</b>	175,106		<b>7</b> <b>Cost of goods sold.</b> Subtract line 6 from line 5. Enter here and in Part I, line 2 . . . . .	<b>7</b>	175,106
<b>3</b> Cost of labor . . . . .	<b>3</b>			<b>8</b> Do the rules of section 263A (with respect to property produced or acquired for resale) apply to the organization? . . . . .	Yes	No
<b>4 a</b> Additional section 263A costs (attach schedule) . . . . .	<b>4a</b>					X
<b>b</b> Other costs (attach schedule) . . . . .	<b>4b</b>					
<b>5 Total.</b> Add lines 1 through 4b . . . . .	<b>5</b>	175,106				

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

**Sign Here**  **Date** 8/17/2010 **Title** VP for Fin & Admin

Signature of officer \_\_\_\_\_ Date \_\_\_\_\_ Title \_\_\_\_\_

**Paid Preparer's Use Only** Preparer's signature  Date 8-10-10 Check if self-employed  Preparer's SSN or PTIN P00444822

Firm's name (or yours if self-employed), address, and ZIP code **Argy, Wiltse & Robinson, PC** EIN 54-1586993  
8405 Greensboro Dr, Ste 700 McLean, VA 22102 Phone no. 703-893-0600

May the IRS discuss this return with the preparer shown below (see instructions)?  Yes  No

**Schedule C—Rent Income (From Real Property and Personal Property Leased With Real Property)**

(see instructions on page 19)

1 Description of property		
(1)		
(2)		
(3)		
(4)		
2 Rent received or accrued		3(a) Deductions directly connected with the income in columns 2(a) and 2(b) (attach schedule)
(a) From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%)	(b) From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income)	
(1)		
(2)		
(3)		
(4)		
Total	0	0
<b>(c) Total income.</b> Add totals of columns 2(a) and 2(b). Enter here and on page 1, Part I, line 6, column (A) . . . . . ▶		<b>(b) Total deductions.</b> Enter here and on page 1, Part I, line 6, column (B) ▶ 0

**Schedule E—Unrelated Debt-Financed Income (see instructions on page 19)**

1 Description of debt-financed property	2 Gross income from or allocable to debt-financed property	3 Deductions directly connected with or allocable to debt-financed property		
		(a) Straight line depreciation (attach schedule) STMT 6	(b) Other deductions (attach schedule) STMT 5	
(1) NPR West Coast Production Facility	388,381	41,710	210,028	
(2)				
(3)				
(4)				
4 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule) STMT 6	5 Average adjusted basis of or allocable to debt-financed property (attach schedule) STMT 6	6 Column 4 divided by column 5	7 Gross income reportable (column 2 × column 6)	8 Allocable deductions (column 6 × total of columns 3(a) and 3(b))
(1) 1,964,472	2,618,466	75%	291,286	188,804
(2)		%	0	0
(3)		%	0	0
(4)		%	0	0
<b>Totals</b> . . . . . ▶			Enter here and on page 1, Part I, line 7, column (A). 291,286	Enter here and on page 1, Part I, line 7, column (B). 188,804
<b>Total dividends-received deductions</b> included in column 8 . . . . . ▶				

**Schedule F—Interest, Annuities, Royalties, and Rents From Controlled Organizations (see instructions on page 20)**

1 Name of controlled organization	2 Employer identification number	Exempt Controlled Organizations			
		3 Net unrelated income (loss) (see instructions)	4 Total of specified payments made	5 Part of column 4 that is included in the controlling organization's gross income	6 Deductions directly connected with income in column 5
(1)					
(2)					
(3)					
(4)					
Nonexempt Controlled Organizations					
7 Taxable Income	8 Net unrelated income (loss) (see instructions)	9 Total of specified payments made	10 Part of column 9 that is included in the controlling organization's gross income	11 Deductions directly connected with income in column 10	
(1)					
(2)					
(3)					
(4)					
<b>Totals</b> . . . . . ▶			Add columns 5 and 10. Enter here and on page 1, Part I, line 8, column (A). 0	Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B). 0	

**Schedule G—Investment Income of a Section 501(c)(7), (9), or (17) Organization** (see instructions on page 21)

1 Description of income	2 Amount of income	3 Deductions directly connected (attach schedule)	4 Set-asides (attach schedule)	5 Total deductions and set-asides (col. 3 plus col. 4)
(1)				0
(2)				0
(3)				0
(4)				0
<b>Totals</b>	Enter here and on page 1, Part I, line 9, column (A). 0			Enter here and on page 1, Part I, line 9, column (B). 0

**Schedule I—Exploited Exempt Activity Income, Other Than Advertising Income** (see instructions on page 21)

1 Description of exploited activity	2 Gross unrelated business income from trade or business	3 Expenses directly connected with production of unrelated business income	4 Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.	5 Gross income from activity that is not unrelated business income	6 Expenses attributable to column 5	7 Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1) Unqualified Sponsorship	7,138,430	4,097,439	3,040,991	476,352	13,263,491	3,040,991
(2)			0			0
(3)			0			0
(4)			0			0
<b>Totals</b>	Enter here and on page 1, Part I, line 10, col. (A). 7,138,430	Enter here and on page 1, Part I, line 10, col. (B). 4,097,439				Enter here and on page 1, Part II, line 26. 3,040,991

**Schedule J—Advertising Income** (see instructions on page 21)

**Part I Income From Periodicals Reported on a Consolidated Basis**

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5 Circulation income	6 Readership costs	7 Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
<b>Totals (carry to Part II, line (5))</b>	0	0	0	0	0	0

**Part II Income From Periodicals Reported on a Separate Basis** (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5 Circulation income	6 Readership costs	7 Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)				0		0
(2)				0		0
(3)				0		0
(4)				0		0
(5) <b>Totals from Part I</b>	0	0				0
<b>Totals, Part II (lines 1-5)</b>	Enter here and on page 1, Part I, line 11, col. (A). 0	Enter here and on page 1, Part I, line 11, col. (B). 0				Enter here and on page 1, Part II, line 27. 0

**Schedule K—Compensation of Officers, Directors, and Trustees** (see instructions on page 22)

1 Name	2 Title	3 Percent of time devoted to business	4 Compensation attributable to unrelated business
Peter Loewenstein	Vice President	26.00%	44,052
		%	
		%	
		%	
<b>Total. Enter here and on page 1, Part II, line 14.</b>			44,052

National Public Radio, Inc. – EIN 52-0907625  
Form 990-T, FY 2009 (TY 2008)  
Part I, Line 5

**Statement 1: Part I, Line 5, Income (loss) from partnerships**

National Public Media LLC	(88,202)
Highfields Capital IV LP	(10)
<b>Total Income (loss) from partnerships</b>	<b>(88,212)</b>

National Public Radio, Inc. – EIN 52-0907625  
Form 990-T, FY 2009 (TY 2008)  
Part I, Line 12

**Statement 2: Part I, Line 12, Other Income**

Commercial use of the excess capacity of the Public Radio Satellite Interconnection System (PRSS)	2,666,282
Studio rental services	1,395
Unqualified sponsorship	80,358
<b>Total Other Income</b>	<b>2,748,034</b>

National Public Radio, Inc. - EIN 52-0907625  
Form 990T, FY 2009 (TY 2008)  
Page 1, Part II, Line 28, Other Deductions

**Statement 3: Part II, Line 28, Other Deductions\***

On-line Shop (includes professional services, freight, and salaries & wages expense)	147,439
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Expenses related to the commercial use of  
excess capacity of the Public Radio Satellite  
Interconnection System (PRSS)

Communications	260,767
Sales Operations	376,948
Billing	81,120
Contracts	252,785
Operations	526,036
Network Operations Center	1,377,563
Engineering	138,702
Depot	<u>210,943</u>
<b>Total PRSS expenses</b>	<b>3,224,865</b>
 <b>Total Other Deductions</b>	 <b>3,372,304</b>

\* Amounts listed are those expenses incurred in unrelated business (commercial) activities.

National Public Radio, Inc. - EIN 52-0907625  
Form 990T, FY 2009 (TY 2008)  
Page 1, Part II, Line 31  
Net Operating Loss Deduction

Statement 4

Year Ended	NOL Amount	NOL Utilized	NOL Carryforward
09/30/94	320,635	-	320,635
09/30/95	324,624	-	645,259
09/30/96	388,320	-	1,033,579
09/30/97	-	-	1,033,579
09/30/98	590,045	-	1,623,624
09/30/99	481,708	-	2,105,332
09/30/00	562,220	-	2,667,552
09/30/01	15,110	-	2,682,662
09/30/02	601,984	-	3,284,646
09/30/03	1,113,126	-	4,397,772
09/30/04	1,150,153	-	5,547,925
09/30/05	1,313,092	-	6,861,017
09/30/06	2,557,159	-	9,418,176
09/30/07	1,915,834	-	11,334,010
09/30/08	1,050,477	-	12,384,487
09/30/09	621,965	-	13,006,452

National Public Radio, Inc. – EIN 52-0907625  
Form 990-T, FY 2009 (TY 2008)  
Page 3, Schedule E, Column (b) Other Deductions

**Statement 5: Rental Expenses**

Debt Service Expenses	120,128
Operating Expenses	49,066
Real Estate Taxes	40,834
<b>Total Other Deductions</b>	<b>210,028</b>

National Public Radio, Inc. – EIN 52-0907625  
Form 990-T, FY 2009 (TY 2008)  
Schedule E, Columns 3-5  
Unrelated Debt-Financed Income

**Statement 6**

**Column 3a: Straight line depreciation (Half-month convention)**

Original Cost	1,626,701
Depreciable Life	39
Depreciation	41,710

**Column 4: Average Acquisition Debt**

Outstanding Principle at:

October 2008	1,999,472
November 2008	1,999,472
December 2008	1,999,472
January 2009	1,999,472
February 2009	1,999,472
March 2009	1,999,472
April 2009	1,929,472
May 2009	1,929,472
June 2009	1,929,472
July 2009	1,929,472
August 2009	1,929,472
September 2009	1,929,472
<b>Average:</b>	<b>1,964,472</b>

**Column 5: Average Adjusted Basis**

Adjusted Basis at:

October 1, 2008	2,639,321
September 30, 2009	2,597,611
<b>Average</b>	<b>2,618,466</b>

National Public Radio, Inc – EIN 52-0907625  
Form 990-T, FY 2009 (TY 2008)  
Part II, Line 21

**Statement 7:** Form 990-T, Part II, Line 21, Depreciation & Form 4562, line 16

Represents the share of depreciation of the public radio satellite interconnection system proportionate to its use in unrelated business. **89,703**

<u>Asset Category</u>	<u>Depreciation</u>
Technical Equipment	341,072
Vehicles	3,941
Total Depreciation	345,012
Commercial Usage Allocation Percentage	26%
<b>Depreciation Allocated to Unrelated Business Activities</b>	<b>89,703</b>

## Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury  
Internal Revenue Service (99)

▶ See separate instructions.      ▶ Attach to your tax return.

Name(s) shown on return National Public Radio, Inc.	Business or activity to which this form relates 990T	Identifying number 52-0907625
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**Part I Election To Expense Certain Property Under Section 179**

Note: If you have any listed property, complete Part V before you complete Part I.

1 Maximum amount. See the instructions for a higher limit for certain businesses . . . . .	1	250,000
2 Total cost of section 179 property placed in service (see instructions). . . . .	2	
3 Threshold cost of section 179 property before reduction in limitation . . . . .	3	800,000
4 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0- . . . . .	4	0
5 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions . . . . .	5	250,000
<b>(a) Description of property</b>		
<b>(b) Cost (business use only)</b>		
<b>(c) Elected cost</b>		
6		
7 Listed property. Enter the amount from line 29 . . . . .	7	
8 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 . . . . .	8	0
9 Tentative deduction. Enter the smaller of line 5 or line 8 . . . . .	9	0
10 Carryover of disallowed deduction from line 13 of your 2007 Form 4562. . . . .	10	
11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5 (see instructions) . . . . .	11	
12 Section 179 expense deduction. Add lines 9 and 10, but do not enter more than line 11 . . . . .	12	0
13 Carryover of disallowed deduction to 2009. Add lines 9 and 10, less line 12 . . . . .	▶ 13	0

Note: Do not use Part II or Part III below for listed property. Instead, use Part V.

**Part II Special Depreciation Allowance and Other Depreciation (Do not include listed property.) (See instructions.)**

14 Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year (see instructions). . . . .	14	
15 Property subject to section 168(f)(1) election . . . . .	15	
16 Other depreciation (including ACRS). . . . .	16	89,703

**Part III MACRS Depreciation (Do not include listed property.) (See instructions.)**

**Section A**

17 MACRS deductions for assets placed in service in tax years beginning before 2008 . . . . .	17	
18 If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here . . . . .	<input type="checkbox"/>	

**Section B - Assets Placed in Service During 2008 Tax Year Using the General Depreciation System**

(a) Classification of property	(b) Month and year placed in service	(c) Basis for depreciation (business/investment)	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction
19 a 3-year property						
b 5-year property						
c 7-year property						
d 10-year property						
e 15-year property						
f 20-year property						
g 25-year property			25 yrs.		S/L	
h Residential rental property			27.5 yrs.	MM	S/L	
i Nonresidential real property			39 yrs.	MM	S/L	
				MM	S/L	

**Section C - Assets Placed in Service During 2008 Tax Year Using the Alternative Depreciation System**

20 a Class life					S/L	
b 12-year			12 yrs.		S/L	
c 40-year			40 yrs.	MM	S/L	

**Part IV Summary (See instructions.)**

21 Listed property. Enter amount from line 28 . . . . .	21	
22 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations - see instr. . . . .	22	89,703
23 For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs . . . . .	▶ 23	

For Paperwork Reduction Act Notice, see separate instructions.

# Disclosure Statement

Do not use this form to disclose items or positions that are contrary to Treasury regulations. Instead, use Form 8275-R, Regulation Disclosure Statement.

See separate instructions.

▶ Attach to your tax return.

Name(s) shown on return

National Public Radio, Inc.

Identifying number shown on return

52-0907625

**Part I** General Information (see instructions)

(a) Rev. Rul., Rev. Proc., etc.	(b) Item or Group of Items	(c) Detailed Description of Items	(d) Form or Schedule	(e) Line No.	(f) Amount
1 N/A	Other Income	Distribution Operations Expense Methodology and Net Operating Loss	990-T	28,31	3,224,865
2 N/A	Partnership	NPM LLC Partnership Sale of equity share	990-T	5	
3					
4					
5					
6					

**Part II** Detailed Explanation (see instructions)

- 1 Distribution Operations Expense Methodology and Net Operating Loss - National Public Radio ("NPR") reports revenue received from sales of the excess capacity of the Public Radio satellite Interconnection System ("PRSS") provided to non-public radio customers (commercial) use as unrelated business income for the current year and in preceding years (continued 2nd page)
- 2 In 2007, National Public Radio (NPR) acquired an 80% equity share in National Public Media LLC (NPM). During the current tax year, NPM admitted a new partner with a 10% equity share in the partnership and increased the number of partners from two to three. As a result, NPR's original ownership was reduced by 10%, from 80% to 72%. One-half of the cash (continued on 2nd page)
- 3
- 4
- 5
- 6

**Part III** Information About Pass-Through Entity. To be completed by partners, shareholders, beneficiaries, or residual interest holders.

Complete this part only if you are making adequate disclosure for a pass-through item.

**Note:** A pass-through entity is a partnership, S corporation, estate, trust, regulated investment company (RIC), real estate investment trust (REIT), or real estate mortgage investment conduit (REMIC).

<p>1 Name, address, and ZIP code of pass-through entity</p> <p>Name _____</p> <p>Address _____</p> <p>City _____</p> <p>State _____ Zip Code _____</p> <p>Foreign country _____</p>	<p>2 Identifying number of pass-through entity _____</p> <hr/> <p>3 Tax year of pass-through entity _____ to _____</p> <hr/> <p>4 Internal Revenue Service Center where the pass-through entity filed its return _____</p>
---	--

**Part IV** Explanations (continued from Parts I and/or II)

1 (giving rise to the net operating loss carry-forward, shown on 990-T, Line 31), NPR deducts expenses associated with its "distribu  
 1 operations," including each proportional share of administrative costs, that are attributable to the commercial usage using the folk  
 1 methodology: Expenses of units that are exclusive to commercial operations are deducted from gross unrelated business incom  
 1 In addition, expenses of units (e.g. Business Affairs, Facilities Engineering and Satellite Maintenance and Repair Depot) are  
 1 allocated to public radio use and commercial use based on factors such as invoices processed, percentage of time spent, or  
 1 shipping records, etc. Certain joint expenses associated with satellite operations are allocated to public radio use  
 1 and commercial use based on the total actual (weighted) transponder hours.

2 contributed by the new partner was distributed to the original two partners. The Form 1065 and Schedules K-1 filed by the  
 2 partnership did not report the transaction as a disguised sale under Sec. 707. Any gain recognized by the transferor partner  
 2 would be considered gain from the sale of a capital asset under Sec. 741. Since the investment in NPM is related to NPR's  
 2 mission, such gain is excluded by Sec. 512(b)(5). Therefore, NPR has not reported any portion of the disguised sale as  
 2 unrelated business income.

# Information Return of U.S. Persons With Respect To Certain Foreign Corporations

OMB No. 1545-0704

Department of the Treasury  
Internal Revenue Service

▶ See separate instructions.

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning **10/1/2008**, and ending **9/30/2009**

Attachment  
Sequence No. **121**

Name of person filing this return <b>National Public Radio, Inc.</b>	A Identifying number <b>52-0907625</b>
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) <b>635 Massachusetts Ave, NW</b>	B Category of filer (See instructions. Check applicable box(es)); 1 (repealed) 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input checked="" type="checkbox"/>
City or town, state, and ZIP code <b>Washington DC 20001</b>	C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period <b>100.00%</b>
Filer's tax year beginning <b>10/1/2008</b> , and ending <b>9/30/2009</b>	

D Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director

**Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.**

1a Name and address of foreign corporation Name <b>NPR Media Berlin gGmbH</b> Address <b>Kurfurstendamm 32</b> City <b>Berlin</b> State <b> </b> Zip <b>10719</b> Country <b>Germany</b>				b Employer identification number, if any <b>2760251402</b>	
d Date of incorporation <b>2/2/2006</b>				c Country under whose laws incorporated <b>Germany</b>	
e Principal place of business <b>Germany</b>		f Principal business activity code number <b>515100</b>		g Principal business activity <b>Broadcasting</b>	
h Functional currency <b>Euro.</b>					

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States Name <b>N/A</b> ID Num <b> </b> Address <b> </b> City <b> </b> ST <b> </b> Zip <b> </b>			b If a U.S. income tax return was filed, enter: (i) Taxable income or (loss) <b>N/A</b> (ii) U.S. income tax paid (after all credits) <b>N/A</b>		
c Name and address of foreign corporation's statutory or resident agent in country of incorporation Name <b>NPR Media Berlin gGmbH c/o Attorney White &amp; Case LLP</b> Address <b>Kurfurstendamm 32</b> City <b>Berlin</b> ST <b> </b> Zip <b>10719</b> Country <b>Germany</b>			d Name & address (including corporate department, if applicable) of person (or persons) with custody of the books & records of the foreign corporation, & the location of such books & records, if different Name <b>National Public Radio, Inc</b> Address <b>635 Massachusetts Ave, NW</b> City <b>Washington</b> State <b>DC</b> Zip <b>20001</b> Country <b> </b> Location of Books/Records if different <b> </b>		

**Schedule A Stock of the Foreign Corporation**

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
Wholly Owned Foreign Enterprise		
No Stock Issued		

**Schedule B U.S. Shareholders of Foreign Corporation** (see instructions)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: <i>This description should match the corresponding description entered in Schedule A, column (a).</i>	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
Name National Public Radio, Inc Str 635 Massachusetts Ave, NW City Washington ST DC Zip 20001 ID Num	Wholly Owned Foreign Enterprise No Stock issued			
Name Str City ST Zip ID Num				
Name Str City ST Zip ID Num				
Name Str City ST Zip ID Num				
Name Str City ST Zip ID Num				

**Schedule C Income Statement** (see instructions)

**Important:** Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for DASTM corporations.

		Functional Currency	U.S. Dollars	
<b>Income</b>	1 a Gross receipts or sales	1a		
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c	0	
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3	0	
	4 Dividends	4		
	5 Interest	5		
	6 a Gross rents	6a		
	b Gross royalties and license fees	6b		
7 Net gain or (loss) on sale of capital assets	7			
8 Other income (attach schedule)	8			
9 Total income (add lines 3 through 8)	9	0	0	
<b>Deductions</b>	10 Compensation not deducted elsewhere	10		
	11 a Rents	11a		
	b Royalties and license fees	11b		
	12 Interest	12		
	13 Depreciation not deducted elsewhere	13		
	14 Depletion	14		
	15 Taxes (exclude provision for income, war profits, and excess profits taxes)	15		
	16 Other deductions (attach schedule—exclude provision for income, war profits, and excess profits taxes) . . . See Statement 1	16	60,291	81,480
17 Total deductions (add lines 10 through 16)	17	60,291	81,480	
<b>Net Income</b>	18 Net income or (loss) before extraordinary items, prior period adjustments, and the provision for income, war profits, and excess profits taxes (subtract line 17 from line 9)	18	-60,291	-81,480
	19 Extraordinary items and prior period adjustments (see instructions)	19		
	20 Provision for income, war profits, and excess profits taxes (see instructions)	20		
	21 Current year net income or (loss) per books (combine lines 18 through 20)	21	-60,291	-81,480

**Schedule E** Income, War Profits, and Excess Profits Taxes Paid or Accrued (see instructions)

	(a) Name of country or U.S. possession	Amount of tax		
		(b) In foreign currency	(c) Conversion rate	(d) In U.S. dollars
1	U.S.			
2				
3				
4				
5				
6				
7				
8	Total			0

**Schedule F** Balance Sheet

**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	35,273	38,025
2 a	Trade notes and accounts receivable		
b	Less allowance for bad debts	( )	( )
3	Inventories		
4	Other current assets (attach schedule)		
5	Loans to shareholders and other related persons		
6	Investment in subsidiaries (attach schedule)		
7	Other investments (attach schedule)		
8 a	Buildings and other depreciable assets		
b	Less accumulated depreciation	( )	( )
9 a	Depletable assets		
b	Less accumulated depletion	( )	( )
10	Land (net of any amortization)		
11	Intangible assets:		
a	Goodwill		
b	Organization costs		
c	Patents, trademarks, and other intangible assets		
d	Less accumulated amortization for lines 11a, b, and c	( )	( )
12	Other assets (attach schedule)		
13	Total assets	35,273	38,025
<b>Liabilities and Shareholders' Equity</b>			
14	Accounts payable		
15	Other current liabilities (attach schedule)		
16	Loans from shareholders and other related persons		
17	Other liabilities (attach schedule)		
18	Capital stock:		
a	Preferred stock		
b	Common stock		
19	Paid-in or capital surplus (attach reconciliation) . . . See Statement 2	259,660	341,140
20	Retained earnings	( 224,387)	( 303,115)
21	Less cost of treasury stock	( )	( )
22	Total liabilities and shareholders' equity	35,273	38,025

**Schedule G Other Information**

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
|   | Yes                      | No                                  |
| 1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If "Yes," see the instructions for required attachment.   |                          |                                     |
| 2 During the tax year, did the foreign corporation own an interest in any trust? . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as entities separate from their owners under Regulations sections 301.7701-2 and 301.7701-3 (see instructions)? . . . . . | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If "Yes," you are generally required to attach Form 8858 for each entity (see instructions).  |                          |                                     |
| 4 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5 During the course of the tax year, did the foreign corporation become a participant in any cost sharing arrangement? . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Schedule H Current Earnings and Profits** (see instructions)

**Important:** Enter the amounts on lines 1 through 5c in **functional** currency.

1 Current year net income or (loss) per foreign books of account . . . . .	<b>1</b>	-60,291
2 Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):		
a Capital gains or losses . . . . .	Net Additions	Net Subtractions
b Depreciation and amortization . . . . .		
c Depletion . . . . .		
d Investment or incentive allowance . . . . .		
e Charges to statutory reserves . . . . .		
f Inventory adjustments . . . . .		
g Taxes . . . . .		
h Other (attach schedule) . . . . .		
3 Total net additions . . . . .	0	
4 Total net subtractions . . . . .		0
5 a Current earnings and profits (line 1 plus line 3 minus line 4) . . . . .	<b>5a</b>	-60,291
b DASTM gain or (loss) for foreign corporations that use DASTM (see instructions) . . . . .	<b>5b</b>	
c Combine lines 5a and 5b . . . . .	<b>5c</b>	-60,291
d Current earnings and profits in U.S. dollars (line 5c translated at the appropriate exchange rate as defined in section 989(b) and the related regulations (see instructions)) . . . . .	<b>5d</b>	-81,480
Enter exchange rate used for line 5d <span style="float:right">▶</span>		0.73995

**Schedule I Summary of Shareholder's Income From Foreign Corporation** (see instructions)

1 Subpart F income (line 38b, Worksheet A in the instructions) . . . . .	<b>1</b>	
2 Earnings invested in U.S. property (line 17, Worksheet B in the instructions) . . . . .	<b>2</b>	
3 Previously excluded subpart F income withdrawn from qualified investments (line 6b, Worksheet C in the instructions) . . . . .	<b>3</b>	
4 Previously excluded export trade income withdrawn from investment in export trade assets (line 7b, Worksheet D in the instructions) . . . . .	<b>4</b>	
5 Factoring income . . . . .	<b>5</b>	
6 Total of lines 1 through 5. Enter here and on your income tax return. See instructions . . . . .	<b>6</b>	0
7 Dividends received (translated at spot rate on payment date under section 989(b)(1)) . . . . .	<b>7</b>	
8 Exchange gain or (loss) on a distribution of previously taxed income . . . . .	<b>8</b>	

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| • Was any income of the foreign corporation blocked? . . . . .                             | Yes                      | No                                  |
| • Did any such income become unblocked during the tax year (see section 964(b))? . . . . . | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

If the answer to either question is "Yes," attach an explanation.

**SCHEDULE J  
(Form 5471)**

(Rev. December 2005)  
Department of the Treasury  
Internal Revenue Service

**Accumulated Earnings and Profits (E&P)  
of Controlled Foreign Corporation**

OMB No. 1545-0704

▶ Attach to Form 5471. See Instructions for Form 5471.

Name of person filing Form 5471 National Public Radio, Inc.		Identifying number 52-0907625	
Name of foreign corporation NPR Media Berlin gGmbH			

	(a) Post-1986 Undistributed Earnings (post-86 section 959(c)(3) balance)	(b) Pre-1987 E&P Not Previously Taxed (pre-87 section 959(c)(3) balance)	(c) Previously Taxed E&P (see instructions)		(d) Total Section 964(a) E&P (combine columns (a), (b), and (c))
			(i) Earnings Invested in U.S. Property	(ii) Earnings Invested in Excess Passive Assets (iii) Subpart F Income	
<b>1</b> Balance at beginning of year	-160,551				-160,551
<b>2 a</b> Current year E&P					
<b>b</b> Current year deficit in E&P	60,291				
<b>3</b> Total current and accumulated E&P not previously taxed (line 1 plus line 2a or line 1 minus line 2b)	-220,842	0			
<b>4</b> Amounts included under section 951(a) or reclassified under section 959(c) in current year					
<b>5 a</b> Actual distributions or reclassifications of previously taxed E&P					
<b>b</b> Actual distributions of nonpreviously taxed E&P					
<b>6 a</b> Balance of previously taxed E&P at end of year (line 1 plus line 4, minus line 5a)			0	0	0
<b>b</b> Balance of E&P not previously taxed at end of year (line 3 minus line 4, minus line 5b)	-220,842				
<b>7</b> Balance at end of year. (Enter amount from line 6a or line 6b, whichever is applicable.)	-220,842	0	0	0	-220,842

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

(HTA)

Schedule J (Form 5471) (Rev. 12-2005)

**SCHEDULE M  
(Form 5471)**

(Rev. December 2007)  
Department of the Treasury  
Internal Revenue Service

**Transactions Between Controlled Foreign Corporation  
and Shareholders or Other Related Persons**

OMB No. 1545-0704

▶ Attach to Form 5471. See instructions for Form 5471.

Name of person filing Form 5471 <b>National Public Radio, Inc.</b>	Identifying number <b>52-0907625</b>
Name of foreign corporation <b>NPR Media Berlin gGmbH</b>	

**Important:** Complete a *separate* Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Germany

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶ Euro 0.7399

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.)					
4 Buy-in payments received					
5 Cost sharing payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services					
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Dividends received (exclude deemed distributions under subpart F and distributions of previously taxed income)					
10 Interest received					
11 Premiums received for insurance or reinsurance					
12 Add lines 1 through 11	0	0	0	0	0
13 Purchases of stock in trade (inventory)					
14 Purchases of tangible property other than stock in trade					
15 Purchases of property rights (patents, trademarks, etc.)					
16 Buy-in payments paid					
17 Cost sharing payments paid					
18 Compensation paid for technical, managerial, engineering, construction, or like services					
19 Commissions paid					
20 Rents, royalties, and license fees paid					
21 Dividends paid					
22 Interest paid					
23 Premiums paid for insurance or reinsurance					
24 Add lines 13 through 23	0	0	0	0	0
25 Amounts borrowed (enter the maximum loan balance during the year) — see instructions					
26 Amounts loaned (enter the maximum loan balance during the year) — see instructions					

National Public Radio, Inc – EIN 52-0907625  
Form 5471, Information Return of US Persons With Respect To Certain Foreign Corporations  
TY 2008 (FY 2009)  
Page 2, Schedule C, Line 16, Other Deductions

Statement 1: Other Deductions

Foreign Content	7,124
Professional Services	4,829
Consultants	5,850
Legal Services	570
Connectivity	63,816
Bank Charges	(2,129)
Fees	<u>1,420</u>
Total Other Deductions	<u>81,480</u>

National Public Radio, Inc – EIN 52-0907625  
Form 5471, Information Return of US Persons With Respect To Certain Foreign Corporations  
TY 2008 (FY 2009)  
Page 3, Schedule F, Line 19, Paid-In Capital

Statement 2: Paid-In Capital Surplus

Beginning Paid-In Capital 10/01/08	259,660
Additions:	
FY08 Paid-In Capital	<u>81,480</u>
Ending Paid-In Capital 09/30/09	<u>341,140</u>

## Return by a U.S. Transferor of Property to a Foreign Corporation

▶ Attach to your income tax return for the year of the transfer or distribution.

**Part I U.S. Transferor Information** (see instructions)

Name of transferor <b>National Public Radio, Inc dba NPR</b>	Identifying number (see instructions) <b>52-0907625</b>
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- 1** If the transferor was a corporation, complete questions 1a through 1d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No  
 If not, list the controlling shareholder(s) and their identifying number(s):

Controlling shareholder	Identifying number

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No  
 If not, list the name and employer identification number (EIN) of the parent corporation:

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(5) been made?  Yes  No
- 2** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 2a through 2d.

**a** List the name and EIN of the transferor's partnership:

Name of partnership	EIN of partnership

- b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  Yes  No
- c** Is the partner disposing of its **entire** interest in the partnership?  Yes  No
- d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  Yes  No

**Part II Transferee Foreign Corporation Information** (see instructions)

3 Name of transferee (foreign corporation) <b>NPR Media Berlin gGmbH</b>	4 Identifying number, if any <b>27-60251402</b>
---	--

5 Address (including country)  
**Kurfurstendamm 31, Berlin Germany, 10719**

6 Country code of country of incorporation or organization (see instructions)  
**Germany**

7 Foreign law characterization (see instructions)  
**Corporation**

- 8** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

**Part III** Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	Various		81,480		
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or business not listed under another category					
Intangible property					
Property to be leased (as described in Temp. Regs. sec. 1.367(a)-4T(c))					
Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property					

Supplemental Information Required To Be Reported (see instructions):

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**Part IV** Additional Information Regarding Transfer of Property (see instructions)

9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer:

(a) Before 100% (b) After 100%

10 Type of nonrecognition transaction (see instructions) ▶ IRC Section 351

11 Indicate whether any transfer reported in Part III is subject to any of the following:

- a Gain recognition under section 904(f)(3) . . . . .  Yes  No
- b Gain recognition under section 904(f)(5)(F) . . . . .  Yes  No
- c Recapture under section 1503(d) . . . . .  Yes  No
- d Exchange gain under section 987 . . . . .  Yes  No

12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?  Yes  No

13 Indicate whether the transferor was required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T for any of the following:

- a Tainted property . . . . .  Yes  No
- b Depreciation recapture . . . . .  Yes  No
- c Branch loss recapture . . . . .  Yes  No
- d Any other income recognition provision contained in the above-referenced regulations . . . . .  Yes  No

14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?  Yes  No

15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?  Yes  No

b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$ \_\_\_\_\_

16 Was cash the only property transferred?  Yes  No

17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?  Yes  No

b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

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