

A Calculate leaving entity's ACA
(allocable cost amount)

B Allocate the result to each of the
membership interests by dividing the
result by the number of those
membership interests

C If there is more than one class of
membership interest in the leaving
entity, allocate the ACA to each
class in proportion to the market
value of all of the membership
interests in the class

D Allocate the result to each of the
membership interests in the class by
dividing the result by the number of
those membership interests in the
class

= Tax cost setting amounts for the
leaving entity's membership interests

Market
valuation

Calculating the exit ACA

1. Start with terminating values of assets that the leaving entity takes with it
2. Add certain inherited deductions not reflected in the terminating value of the assets leaving the group
3. Add intragroup liabilities owed to the leaving entity at the leaving time
4. Subtract liabilities and certain membership interests treated as liabilities for the purpose of this calculation
5. The ACA is the remaining amount (if positive) or nil (if negative)

Consolidation Reference Manual

JS Bruner



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