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## Rev. Proc. 2025-13: Streamlined procedure for taxpayers to revoke election to apply alternative tax for non-life insurance companies under section 831(b)

The IRS released Rev. Proc. 2025-13 that provides a streamlined procedure for a taxpayer that has elected the application of the alternative tax for certain non-life insurance companies under section 831(b) to obtain the automatic consent of the Secretary of the Treasury or her delegate to revoke such election.

As indicated in the preamble to the final regulations identifying certain micro-captive transactions as listed transactions and certain other micro-captive transactions as transactions of interest (read <u>TaxNewsFlash</u>), the IRS issued Rev. Proc. 2025-13 in response to comments received on the proposed regulations adopted by those final regulations.

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