



KPMG AEOL Updates & Tracking Service FATCA Alert



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Liechtenstein: Updated FATCA Technical Guidance

On 27 February 2025, the Tax Authority of Liechtenstein updated its FATCA reporting technical guidance. The guidance supersedes the version published on 01 June 2023. The guidance was updated to reflect the extension of temporary relief for Foreign Financial Institutions (FFIs) concerning the reporting of U.S. Taxpayer Identification Numbers (TINs).

The guidance notes that, per the extension provided by Notice 2024-78 (see [here](#)) regarding the temporary relief granted by Notice 2023-11 (see [here](#)), FFIs reporting for calendar years 2022 to 2027 (due June 30 of the following years) will not be considered significantly non-compliant when using the U.S. dummy TIN codes for missing U.S. TINs for pre-existing US accounts, subject to the fulfillment of requirements outlined in the notices.

Notice 2024-78 outlined the following additional requirements that need to be adhered to in order to obtain relief, beginning with the 2025 reporting period.

- Reporting the foreign taxpayer identification number (FTIN) of the U.S. account holder and/or U.S. controlling person assigned by the respective country of residence, if it is available in the electronic data records.
- Reporting the city and country of residence of the U.S. account holder and/or U.S. controlling person in the "AddressFix" reporting element.

Liechtenstein Contacts:



Jason Zuecker
Director
jzuecker@kpmg.com



Nicolas Candolfi
Senior Manager
ncandolfi@kpmg.com

FFIs should retain records of the policies and procedures applied to comply with Notice 2023-11 and Notice 2024-78 until the end of the 2031 calendar year.

In addition, Section 4.1 of the guidance has been revised to note that when using a U.S. TIN or a U.S. dummy TIN code for the U.S. substantial owner of a non-U.S. entity, the mandatory field "TIN issued by" must be completed with the country code "U.S."

Reference: [FATCA Technical Guidance](#) [PDF 1,267KB],
[Newsletter 03/2025](#) [142KB]

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For more information on KPMG AEOI Updates & Tracking Service, please see [here](#).

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Contact us



Laurie Hatten-Boyd
Principal
T: +1 213 -206- 4001
E: lhattenboyd@kpmg.com

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Kelli Wooten
Principal
T: +1 404 739 5888
E: kwooten@KPMG.com

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