the amount subject to tax for the next 6 succeeding taxable years beginning with taxable year 1972 as provided in this section. In applying the carryover to 1972 and succeeding taxable years, the carryover of N Corporation subject to the limitation of §1.56A–5(e)(4) is combined with any carryovers originating with M Corporation in 1970.


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§ 1.56(g)-1 Adjusted current earnings.

(a) Adjustment for adjusted current earnings—(1) Positive adjustment. For taxable years beginning after December 31, 1989, the alternative minimum taxable income of any taxpayer described in paragraph (a)(4) of this section is increased by the adjustment for adjusted current earnings. The adjustment for adjusted current earnings is 75 percent of the excess, if any, of—

(i) The adjusted current earnings (as defined in paragraph (a)(6)(ii) of this section) of the taxpayer for the taxable year over—

(ii) Modifications required.

(A) In general.
(B) Negative modifications allowed.

(iii) LIFO recapture adjustment.

(3) Time and manner of making election.

(i) Prospective election.
(ii) Retroactive election.

(iii) Taxpayers under examination.

(A) In general.
(1) Year of change under examination.
(2) Other open years under examination.

(B) Statement required.

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(D) Treatment of additional tax liability.

(iv) Election as method of accounting.

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(5) Election to use alternative minimum tax inventories to compute adjusted current earnings.

(s) Adjustment for alternative tax energy preference deduction.

(1) In general.
(2) Example.