# Form **3115**

(Rev. December 2009)
Department of the Treasury

# **Application for Change in Accounting Method**

OMB No. 1545-0152

Internal Revenue Service				
Name of filer (name of parent corporation if a consolidat	ted group) (see instructions)	Identification number (see instructions)		
		Principal business activity code number (see instruction	ıs)	
Number, street, and room or suite no. If a P.O. box, see	the instructions.	Tax year of change begins (MM/DD/YYYY)		
		Tax year of change ends (MM/DD/YYYY)		
City or town, state, and ZIP code		Name of contact person (see instructions)		
N				
Name of applicant(s) (if different than filer) and identification	tion number(s) (see instructions)	Contact person's telepho	one number	
If the applicant is a member of a consolidat	ed group, check this box .	·		
		ched (see instructions for when Form 2848 is		
required), check this box		<b>.</b>		
Check the box to indicate the type of app	olicant.	Check the appropriate box to indicate the t	ype	
☐ Individual ☐ Cooperative (Sec. 1381)		of accounting method change being reques	sted.	
☐ Corporation	☐ Partnership	(see instructions)		
Controlled foreign corporation	S corporation	☐ Depreciation or Amortization		
(Sec. 957)	Insurance co. (Sec. 816(a))	☐ Financial Products and/or Financial Activities of		
10/50 corporation (Sec. 904(d)(2)(E))	Insurance co. (Sec. 831)	Financial Institutions		
Qualified personal service corporation (Sec. 448(d)(2))	☐ Other (specify) ►	☐ Other (specify) ►		
Exempt organization. Enter Code section	n <b>&gt;</b>			
<u> </u>		unting, the taxpayer must provide all information th		
Form 3115 (including its instructions), as well a The taxpayer must attach all applicable s	as any other information that is no supplemental statements reques		this 	
Part I Information For Automatic				
only one designated automatic accour	nting method change number, exc esignated automatic accounting m	umber for the requested automatic change. Enter tept as provided for in guidance published by the tethod change number, check "Other," and provide the automatic change. See instructions.	Yes No	
► (a) Change No.	(b) Other ☐ Description ►			
2 Do any of the scope limitations des	scribed in section 4.02 of Rev.	Proc. 2008-52 cause automatic consent to be		
unavailable for the applicant's requested change? If "Yes," attach an explanation				
Note. Complete Part II below and then Part IV, and also Schedules A through E of this form (if applicable).  Part II Information For All Requests		gn E of this form (if applicable).	V N-	
•			Yes No	
3 Did or will the applicant cease to engage in the trade or business to which the requested change relates, or terminate its existence, in the tax year of change (see instructions)?				
4a Does the applicant (or any present of applicable tax year(s)) have any Federal If "No," go to line 5.		which the applicant was a member during the xamination (see instructions)?		
<b>b</b> Is the method of accounting the apparture any present or former consolidated	<b>b</b> Is the method of accounting the applicant is requesting to change an issue (with respect to either the applicant or any present or former consolidated group in which the applicant was a member during the applicable tax year(s))			
either (i) under consideration or (ii) p		ons)?		
Under populities of porition I declare that I have every	Signature (see instru	,	dan and halinf	
		ng schedules and statements, and to the best of my knowle and complete. Declaration of preparer (other than applicant)		
Filer		Preparer (other than filer/applicant)		
Signature and date		Signature of individual preparing the application and o	Jate	
Name and title (print or type	<del></del>	Name of individual preparing the application (print or t	ype)	
		Name of firm preparing the application		

Page 2 Form 3115 (Rev. 12-2009) Information For All Requests (continued) Part II Yes No 4c Is the method of accounting the applicant is requesting to change an issue pending (with respect to either the applicant or any present or former consolidated group in which the applicant was a member during the applicable

d	tax year(s)) for any tax year under examination (see instructions)?						
	Is the request to change the method of accounting being filed under the procedures requiring that the operating division director consent to the filing of the request (see instructions)?						
	If "Yes," attach the consent st	atement from the di	rector.				
			_	0-day or 120-day window period?			
				equired statement (see instructions).			
	· ·	Date examination					
	year(s) under examination.	4a, enter the name a	and telephone number of	the examining agent and the tax			
	Name ►	Te	elephone number >	Tax year(s) ►			
	Has a copy of this Form 3115		· · · · · · · · · · · · · · · · · · ·				
5a	· ·	esent or former cons by Federal income ta c (check the box) x year(s) before App	solidated group in which x return(s) before Appea Appeals officer and/	n the applicant was a member during the als and/or a Federal court?			
	Has a copy of this Form 3115 on line 5a?	5 been provided to	the Appeals officer and/	or counsel for the government identified			
i							
6	If the applicant answered "Yes" to line 4a and/or 5a with respect to any present or former consolidated group, attach a statement that provides each parent corporation's (a) name, (b) identification number, (c) address, and (d) tax year(s) during which the applicant was a member that is under examination, before an Appeals office, and/or before a Federal court.						
	If, for federal income tax purposes, the applicant is either an entity (including a limited liability company) treated as a partnership or an S corporation, is it requesting a change from a method of accounting that is an issue under consideration in an examination, before Appeals, or before a Federal court, with respect to a Federal income tax return of a partner, member, or shareholder of that entity?						
	If "Yes," the applicant is <b>not</b> eligible to make the change.						
	receive audit protection for the requested change (see instructions)?						
	b If "Yes," attach an explanation.						
	Has the applicant, its predecessor, or a related party requested or made (under either an automatic change procedure or a procedure requiring advance consent) a change in method of accounting within the past 5 years (including the year of the requested change)?						
b	<b>b</b> If "Yes," for each trade or business, attach a description of each requested change in method of accounting (including the tax year of change) and state whether the applicant received consent.						
	c If any application was withdrawn, not perfected, or denied, or if a Consent Agreement granting a change was not signed and returned to the IRS, or the change was not made or not made in the requested year of change, attach an explanation.						
				ve pending any request (including any accounting, or technical advice?			
				ne taxpayer, identification number(s), the echnical advice), and the specific issue(s)			
	Is the applicant requesting to	•	•				
	If "Yes," check the appropr accounting. Also, complete So			nt's present and proposed methods of			
	Present method:	☐ Cash	☐ Accrual	☐ Hybrid (attach description)			
	Proposed method:	☐ Cash	☐ Accrual	☐ Hybrid (attach description)			
		_ 5451		Form <b>3115</b> (Re			

Form 31	15 (Rev. 12-2009)					Р	age 3
Par	Information	For All Reques	sts (continued)			Yes	No
12 a b c	accounting and also complete description The item(s) being cha The applicant's prese The applicant's propo	changing to a safer each of the saged.  Interpretation of the saged method for the saged meth	special method of action of action of actions of action	ged.	or (ii) is changing its overall method of e or more items, attach a detailed and		
13	3(44, 44, 44, 44, 44, 44, 44, 44, 44, 44,						
14	Will the proposed method of accounting be used for the applicant's books and records and financial statements? For insurance companies, see the instructions						
15a	Has the applicant engaged, or will it engage, in a transaction to which section 381(a) applies (e.g., a reorganization, merger, or liquidation) during the proposed tax year of change determined without regard to any potential closing of the year under section 381(b)(1)?						
b 16	the methods of accounting used by the parties to the section 381(a) transaction immediately before the date of distribution or transfer and the method(s) that would be required by section 381(c)(4) or (c)(5) absent consent to the change(s) requested in this application.						
17	Does the applicant request a conference with the IRS National Office if the IRS proposes an adverse response? If the applicant is changing to either the overall cash method, an overall accrual method, or is changing its method of accounting for any property subject to section 263A, any long-term contract subject to section 460, or inventories subject to section 474, enter the applicant's gross receipts for the 3 tax years preceding the tax year of change.						
	1st preceding year ended: mo.	yr.	2nd preceding year ended: mo.	yr.	3rd preceding year ended: mo. yr.		
Part	Information	For Advance C	Consent Request			Yes	No
18	other published guida	ince as an auton	natic change request	?	e, revenue ruling, notice, regulation, or		
19 20	detailed and complete description of the facts that explains how the law specifically applies to the applicant's situation and that demonstrates that the applicant is authorized to use the proposed method. Include all authority (statutes, regulations, published rulings, court cases, etc.) supporting the proposed method. Also, include either a discussion of the contrary authorities or a statement that no contrary authority exists.  Attach a copy of all documents related to the proposed change (see instructions).						
21 22	If the applicant is a member of a consolidated group for the year of change, do all other members of the consolidated group use the proposed method of accounting for the item being changed?						
23a b Part		user fee attache	user fee, attach the	•	). ► \$tion or certification (see instructions).	Yes	No
24	Does the applicable rev	enue procedure, red d change in metho	evenue ruling, notice, r		published guidance require the applicant to than a section 481(a) adjustment?		
25	income. ► \$ used to determine to computation for each	At he section 4810 he component. If list of the name,	ttach a summary of t (a) adjustment. If it more than one app identification numbe	the computation a is based on m licant is applying r, principal busin	s an increase (+) or a decrease (-) in and an explanation of the methodology ore than one component, show the g for the method change on the same ess activity code (see instructions), and		

Part	Section 481(a) Adjustment (continued)	Page 4
26	ne section 481(a) adjustment is an increase to income of less than \$25,000, does the applicant elect to take the ire amount of the adjustment into account in the year of change?	
27	any part of the section 481(a) adjustment attributable to transactions between members of an affiliated group, a nsolidated group, a controlled group, or other related parties?	
Sche	e A-Change in Overall Method of Accounting (If Schedule A applies, Part I below must be completed	.)
Par	Change in Overall Method (see instructions)	
1	ter the following amounts as of the close of the tax year preceding the year of change. If none, state "None." Also, a tement providing a breakdown of the amounts entered on lines 1a through 1g.	ttach a
	Amou	ınt
а	ome accrued but not received (such as accounts receivable)	
b	ome received or reported before it was earned (such as advanced payments). Attach a description of income and the legal basis for the proposed method	
С	penses accrued but not paid (such as accounts payable)	
d	epaid expenses previously deducted	
e	opplies on hand previously deducted and/or not previously reported	
f	entory on hand previously deducted and/or not previously reported. Complete Schedule D, Part II .	
g	ner amounts (specify). Attach a description of the item and the legal basis for its inclusion in the culation of the section 481(a) adjustment.	
h	t section 481(a) adjustment (Combine lines 1a–1g.) Indicate whether the adjustment is an increase (+) decrease (-) in income. Also enter the net amount of this section 481(a) adjustment amount on Part IV, e 25	
2	he applicant also requesting the recurring item exception under section 461(h)(3)?	□ No
3	ach copies of the profit and loss statement (Schedule F (Form 1040) for farmers) and the balance sheet, if applicable close of the tax year preceding the year of change. Also attach a statement specifying the accounting method us eparing the balance sheet. If books of account are not kept, attach a copy of the business schedules submitted deral income tax return or other return (e.g., tax-exempt organization returns) for that period. If the amounts in Parthrough 1g, do not agree with those shown on both the profit and loss statement and the balance sheet, attach a statement and the differences.	ed wher with the t I, lines
Par	Change to the Cash Method For Advance Consent Request (see instructions)	
Applic	requesting a change to the cash method must attach the following information:	
-		

- 1 A description of inventory items (items whose production, purchase, or sale is an income-producing factor) and materials and supplies used in carrying out the business.
- 2 An explanation as to whether the applicant is required to use the accrual method under any section of the Code or regulations.

### Schedule B—Change to the Deferral Method for Advance Payments (see instructions)

- 1 If the applicant is requesting to change to the Deferral Method for advance payments described in section 5.02 of Rev. Proc. 2004-34, 2004-1 C.B. 991, attach the following information:
  - a A statement explaining how the advance payments meet the definition in section 4.01 of Rev. Proc. 2004-34.
- **b** If the applicant is filing under the automatic change procedures of Rev. Proc. 2008-52, the information required by section 8.02(3)(a)-(c) of Rev. Proc. 2004-34.
- c If the applicant is filing under the advance consent provisions of Rev. Proc. 97-27, the information required by section 8.03(2)(a)-(f) of Rev. Proc. 2004-34.
- If the applicant is requesting to change to the deferral method for advance payments described in Regulations section 1.451-5(b)(1)(ii), attach the following.
- a A statement explaining how the advance payments meet the definition in Regulations section 1.451-5(a)(1).
- **b** A statement explaining what portions of the advance payments, if any, are attributable to services, whether such services are integral to the provisions of goods or items, and whether any portions of the advance payments that are attributable to non-integral services are less than five percent of the total contract prices. See Regulations sections 1.451-5(a)(2)(i) and (3).
- c A statement explaining that the advance payments will be included in income no later than when included in gross receipts for purposes of the applicant's financial reports. See Regulations section 1.451-5(b)(1)(ii).
- **d** A statement explaining whether the inventoriable goods exception of Regulations section 1.451-5(c) applies and if so, when substantial advance payments will be received under the contracts, and how the exception will limit the deferral of income.

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## Schedule C-Changes Within the LIFO Inventory Method (see instructions)

#### Part I General LIFO Information

Complete this section if the requested change involves changes within the LIFO inventory method. Also, attach a copy of all **Forms 970,** Application To Use LIFO Inventory Method, filed to adopt or expand the use of the LIFO method.

- 1 Attach a description of the applicant's present and proposed LIFO methods and submethods for each of the following items:
- a Valuing inventory (e.g., unit method or dollar-value method).
- **b** Pooling (e.g., by line or type or class of goods, natural business unit, multiple pools, raw material content, simplified dollar-value method, inventory price index computation (IPIC) pools, vehicle-pool method, etc.).
- c Pricing dollar-value pools (e.g., double-extension, index, link-chain, link-chain index, IPIC method, etc.).
- **d** Determining the current-year cost of goods in the ending inventory (i.e., most recent acquisitions, earliest acquisitions during the current year, average cost of current-year acquisitions, or other permitted method).
- 2 If any present method or submethod used by the applicant is not the same as indicated on Form(s) 970 filed to adopt or expand the use of the method, attach an explanation.
- 3 If the proposed change is not requested for all the LIFO inventory, attach a statement specifying the inventory to which the change is and is not applicable.
- 4 If the proposed change is not requested for all of the LIFO pools, attach a statement specifying the LIFO pool(s) to which the change is applicable.
- 5 Attach a statement addressing whether the applicant values any of its LIFO inventory on a method other than cost. For example, if the applicant values some of its LIFO inventory at retail and the remainder at cost, identify which inventory items are valued under each method.
- 6 If changing to the IPIC method, attach a completed Form 970.

# Part II Change in Pooling Inventories

- 1 If the applicant is proposing to change its pooling method or the number of pools, attach a description of the contents of, and state the base year for, each dollar-value pool the applicant presently uses and proposes to use.
- 2 If the applicant is proposing to use natural business unit (NBU) pools or requesting to change the number of NBU pools, attach the following information (to the extent not already provided) in sufficient detail to show that each proposed NBU was determined under Regulations section 1.472-8(b)(1) and (2):
- a A description of the types of products produced by the applicant. If possible, attach a brochure.
- **b** A description of the types of processes and raw materials used to produce the products in each proposed pool.
- c If all of the products to be included in the proposed NBU pool(s) are not produced at one facility, state the reasons for the separate facilities, the location of each facility, and a description of the products each facility produces.
- **d** A description of the natural business divisions adopted by the taxpayer. State whether separate cost centers are maintained and if separate profit and loss statements are prepared.
- **e** A statement addressing whether the applicant has inventories of items purchased and held for resale that are not further processed by the applicant, including whether such items, if any, will be included in any proposed NBU pool.
- **f** A statement addressing whether all items including raw materials, goods-in-process, and finished goods entering into the entire inventory investment for each proposed NBU pool are presently valued under the LIFO method. Describe any items that are not presently valued under the LIFO method that are to be included in each proposed pool.
- **g** A statement addressing whether, within the proposed NBU pool(s), there are items both sold to unrelated parties and transferred to a different unit of the applicant to be used as a component part of another product prior to final processing.
- If the applicant is engaged in manufacturing and is proposing to use the multiple pooling method or raw material content pools, attach information to show that each proposed pool will consist of a group of items that are substantially similar. See Regulations section 1.472-8(b)(3).
- If the applicant is engaged in the wholesaling or retailing of goods and is requesting to change the number of pools used, attach information to show that each of the proposed pools is based on customary business classifications of the applicant's trade or business. See Regulations section 1.472-8(c).

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Schedule D-Change in the Treatment of Long-Term Contracts Under Section 460, Inventories, or Other Section 263A Assets (see instructions) Change in Reporting Income From Long-Term Contracts (Also complete Part III on pages 7 and 8.) 1 To the extent not already provided, attach a description of the applicant's present and proposed methods for reporting income and expenses from long-term contracts. Also, attach a representative actual contract (without any deletion) for the requested change. If the applicant is a construction contractor, attach a detailed description of its construction activities. 2a Are the applicant's contracts long-term contracts as defined in section 460(f)(1) (see instructions)? . . . ☐ Yes ☐ No **b** If "Yes," do all the contracts qualify for the exception under section 460(e) (see instructions)? . . . . ☐ Yes □ No If line 2b is "No," attach an explanation. c If line 2b is "Yes," is the applicant requesting to use the percentage-of-completion method using cost-tocost under Regulations section 1.460-4(b)? Yes No If line 2c is "No," is the applicant requesting to use the exempt-contract percentage-of-completion Yes No If line 2d is "Yes." attach an explanation of what cost comparison the applicant will use to determine a contract's completion factor. If line 2d is "No," attach an explanation of what method the applicant is using and the authority for its use. 3a Does the applicant have long-term manufacturing contracts as defined in section 460(f)(2)? . . . . . No Yes If "Yes," attach an explanation of the applicant's present and proposed method(s) of accounting for longterm manufacturing contracts. c Attach a description of the applicant's manufacturing activities, including any required installation of manufactured goods. To determine a contract's completion factor using the percentage-of-completion method: Will the applicant use the cost-to-cost method in Regulations section 1.460-4(b)? . . . . . . . . . Yes No If line 4a is "No," is the applicant electing the simplified cost-to-cost method (see section 460(b)(3) and Yes ☐ No Attach a statement indicating whether any of the applicant's contracts are either cost-plus long-term contracts or Federal long-term contracts. Change in Valuing Inventories Including Cost Allocation Changes (Also complete Part III on pages 7 and 8.) Part II Attach a description of the inventory goods being changed. 2 Attach a description of the inventory goods (if any) NOT being changed. Is the applicant subject to section 263A? If "No," go to line 4a . . . . . . . . . . . . . . . . . . No Yes Is the applicant's present inventory valuation method in compliance with section 263A (see instructions)? Yes No Inventory Not Inventory Being Changed Being Changed Check the appropriate boxes below. Present method Present method Proposed method Identification methods: Other (attach explanation) . . . . Valuation methods: Cost or market, whichever is lower . . . . . . . . Retail cost . . . . . . . . . Other (attach explanation) . . . . . . . . . . . . . . . . . **b** Enter the value at the end of the tax year preceding the year of change If the applicant is changing from the LIFO inventory method to a non-LIFO method, attach the following information (see instructions). Copies of Form(s) 970 filed to adopt or expand the use of the method. Only for applicants requesting advance consent. A statement describing whether the applicant is changing to the method required by Regulations section 1.472-6(a) or (b), or whether the applicant is proposing a different method. Only for applicants requesting an automatic change. The statement required by section 22.01(5) of the Appendix of Rev.

Proc. 2008-52 (or its successor).

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**Method of Cost Allocation** (Complete this part if the requested change involves either property subject to section 263A or long-term contracts as described in section 460 (see instructions)).

#### Section A-Allocation and Capitalization Methods

Attach a description (including sample computations) of the present and proposed method(s) the applicant uses to capitalize direct and indirect costs properly allocable to real or tangible personal property produced and property acquired for resale, or to allocate and, where appropriate, capitalize direct and indirect costs properly allocable to long-term contracts. Include a description of the method(s) used for allocating indirect costs to intermediate cost objectives such as departments or activities prior to the allocation of such costs to long-term contracts, real or tangible personal property produced, and property acquired for resale. The description must include the following:

- 1 The method of allocating direct and indirect costs (i.e., specific identification, burden rate, standard cost, or other reasonable allocation method).
- 2 The method of allocating mixed service costs (i.e., direct reallocation, step-allocation, simplified service cost using the labor-based allocation ratio, simplified service cost using the production cost allocation ratio, or other reasonable allocation method).
- The method of capitalizing additional section 263A costs (i.e., simplified production with or without the historic absorption ratio election, simplified resale with or without the historic absorption ratio election including permissible variations, the U.S. ratio, or other reasonable allocation method).

#### Section B-Direct and Indirect Costs Required To Be Allocated

Check the appropriate boxes showing the costs that are or will be fully included, to the extent required, in the cost of real or tangible personal property produced or property acquired for resale under section 263A or allocated to long-term contracts under section 460. Mark "N/A" in a box if those costs are not incurred by the applicant. If a box is not checked, it is assumed that those costs are not fully included to the extent required. Attach an explanation for boxes that are not checked.

		Present method	Proposed method
1	Direct material		
2	Direct labor		
3	Indirect labor		
4	Officers' compensation (not including selling activities)		
5	Pension and other related costs		
6	Employee benefits		
7	Indirect materials and supplies		
8	Purchasing costs		
9	Handling, processing, assembly, and repackaging costs		
10	Offsite storage and warehousing costs		
11	Depreciation, amortization, and cost recovery allowance for equipment and facilities		
	placed in service and not temporarily idle		
12	Depletion		
13	Rent		
14	Taxes other than state, local, and foreign income taxes		
15	Insurance		
16	Utilities		
17	Maintenance and repairs that relate to a production, resale, or long-term contract activity		
18	Engineering and design costs (not including section 174 research and experimental		
	expenses)		
19	Rework labor, scrap, and spoilage		
20	Tools and equipment		
21	Quality control and inspection		
22	Bidding expenses incurred in the solicitation of contracts awarded to the applicant		
23	Licensing and franchise costs		
24	Capitalizable service costs (including mixed service costs)		
25	Administrative costs (not including any costs of selling or any return on capital)		
26	Research and experimental expenses attributable to long-term contracts		
27	Interest		
28	Other costs (Attach a list of these costs.)	· · · · · · · · · · · · · · · · · · ·	

Form 3115 (Rev. 12-2009) Page 8 Method of Cost Allocation (see instructions) (continued) Section C-Other Costs Not Required To Be Allocated (Complete Section C only if the applicant is requesting to change its method for these costs.) Present method Proposed method 1 2 Research and experimental expenses not included in Section B, line 26 . . . . . 3 Bidding expenses not included in Section B, line 22 4 General and administrative costs not included in Section B 5 6 Cost of strikes . . . . . . . . . . . . . . . . . 7 8 9 10 Depreciation, amortization, and cost recovery allowance not included in Section B. Other costs (Attach a list of these costs.) 11 Schedule E—Change in Depreciation or Amortization (see instructions) Applicants requesting approval to change their method of accounting for depreciation or amortization complete this section. Applicants *must* provide this information for each item or class of property for which a change is requested. Note. See the List of Automatic Accounting Method Changes in the instructions for information regarding automatic changes under sections 56, 167, 168, 197, 1400l, 1400L, or former section 168. Do not file Form 3115 with respect to certain late elections and election revocations (see instructions). Is depreciation for the property determined under Regulations section 1.167(a)-11 (CLADR)? . . . . No Yes If "Yes," the only changes permitted are under Regulations section 1.167(a)-11(c)(1)(iii). 2 Is any of the depreciation or amortization required to be capitalized under any Code section (e.g., section | Yes No If "Yes," enter the applicable section ▶ Has a depreciation, amortization, or expense election been made for the property (e.g., the election under No Yes If "Yes," state the election made ▶ 4a To the extent not already provided, attach a statement describing the property being changed. Include in the description the type of property, the year the property was placed in service, and the property's use in the applicant's trade or business or income-producing activity. If the property is residential rental property, did the applicant live in the property before renting it? . . . No ☐ Yes No To the extent not already provided in the applicant's description of its present method, attach a statement explaining how the property is treated under the applicant's present method (e.g., depreciable property, inventory property, supplies under Regulations section 1.162-3, nondepreciable section 263(a) property, property deductible as a current expense, etc.). If the property is not currently treated as depreciable or amortizable property, attach a statement of the facts supporting the proposed change to depreciate or amortize the property. If the property is currently treated and/or will be treated as depreciable or amortizable property, provide the following 7 information for both the present (if applicable) and proposed methods: The Code section under which the property is or will be depreciated or amortized (e.g., section 168(q)). The applicable asset class from Rev. Proc. 87-56, 1987-2 C.B. 674, for each asset depreciated under section 168 (MACRS) or under section 1400L; the applicable asset class from Rev. Proc. 83-35, 1983-1 C.B. 745, for each asset depreciated under former section 168 (ACRS); an explanation why no asset class is identified for each asset for which an asset class has not been identified by the applicant. The facts to support the asset class for the proposed method. The depreciation or amortization method of the property, including the applicable Code section (e.g., 200% declining balance method under section 168(b)(1)). The useful life, recovery period, or amortization period of the property. The applicable convention of the property. A statement of whether or not the additional first-year special depreciation allowance (for example, as provided by section 168(k), 168(l), 168(m), 168(n), 1400L(b), or 1400N(d)) was or will be claimed for the property. If not, also provide an explanation

as to why no special depreciation allowance was or will be claimed.