

$$\begin{array}{l}
\text{Foreign taxes deemed paid} \\
\text{by domestic shareholder or} \\
\text{upper-tier corporation with} \\
\text{respect to a separate category}
\end{array}
=
\begin{array}{l}
\text{Post-1986 foreign income} \\
\text{taxes of first-tier or lower-tier} \\
\text{corporation allocated and apportioned} \\
\text{to the separate category under § 1.904-6}
\end{array}
\times
\frac{\begin{array}{l}
\text{Dividend amount attributable} \\
\text{to the separate category}
\end{array}}{\begin{array}{l}
\text{Post-1986 undistributed earnings} \\
\text{of first-tier or lower-tier} \\
\text{corporation in the separate category}
\end{array}}$$